

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-LAP

GHISLAINE MAXWELL,

Defendant.

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**Ms. Maxwell's Brief In Support Of Maintaining Categories
Of Documents Under Seal**

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Defendant Ghislaine Maxwell, through her counsel, submits this Brief in support of maintaining categories of documents under seal.

SUMMARY

In accordance with the Court's direction at the hearing on September 4, 2019, the parties on September 18 submitted proposed categories for all the hundreds of sealed court submissions.¹ The parties agreed on seven categories; they disagreed on the four shaded categories below and requested that the Court resolve the disagreement. *See* Doc.987, at 2-4.

1	Motions to Compel and Related Motions for Protective Orders and Court Orders
2	Motions in Limine re Admissibility of Evidence and Related Orders
3	Motions in Limine re Expert Testimony and Related Orders
4	Trial Deposition Designations and Counter-Designations
5	Objections to Trial Deposition Designations and Counter-Designations
6	Filings related to Third-Party Intervenors and Related Orders
7	Filings related to Third-Party – Other – and Related Orders
8	Case Management Filings and Related Orders
9	Adverse Inference/Sanction Motions/ Motions to Strike or Exclude Evidence
10	Trial Motions and Trial Submission
11	Motions re Depositions

As to Categories 4 and 5, the only disagreement is whether they should be combined into one or separated into two categories. As we pointed out in our submission of the proposed categories, separation makes sense since we believe Category 4 collects a large number of court submissions that constitute non-judicial documents. *See* Doc.987 at 3-4.

This brief addresses the first nine categories listed in the chart above. We believe Plaintiff Giuffre's proposed Categories 10 and 11 are superfluous: all the documents Plaintiff contemplates placing in these categories are already captured in Categories 1-2, 5, 6-8. *See id.* at 5.

¹ Appended to this Brief, in a effort to assist the Court, is a list of docket entries that have been identified as Category 1-9 documents.

At the September 4 hearing the Court contemplated that the party urging continued sealing of documents would file one brief of five double-spaced pages for each of the up to ten categories, i.e., up to 45 pages (five pages for nine categories). Tr. of 9/4/2017 Hearing, at 20-22. We respectfully request leave to submit all the briefing in one document. We do so because one brief will be more efficient for the parties and Court as opposed to nine separate briefs and because we can complete the briefing with fewer than five pages per category and in the aggregate far fewer than 45 pages.

We understand the principal purpose of the categorization exercise was to identify entire categories of sealed court submissions that constitute non-judicial documents, which would remain sealed and so there would be no need to notify non-parties. *See id.* at 11 (Court: “[I]f a big category involving the non-parties is ruled out, then we don’t have to bother all the non-parties?”); *id.* at 18 (Court: indicating that identifying non-judicial documents first would avoid needing to “notify[] a thousand [non-parties]”). In this Brief we identify one category—Category 5—that contains exclusively non-judicial documents. The remaining eight categories range from what the Court described as “negligibly judicial,” *id.* at 10, documents with a light presumption of access that easily can be overcome to documents with a heavier presumption of access that requires a weightier interest to overcome it.

Although we agree eight of the categories contain judicial documents on the presumption-of-access spectrum, we note that many of these judicial documents attach exhibits and other items that are *not* judicial documents because, e.g., they were submitted “solely so that the court may decide whether [they] must be disclosed in the discovery process or shielded by a Protective Order,” *Brown v. Maxwell*, 929 F.3d 41, 50 n.33 (2d Cir. 2019); *see* Doc.989, at 2-3. As discussed in our September 23, 2019, letter to the Court, we understand that briefing on such

attachments and exhibits to judicial documents will be completed at a later time so that non-parties can be notified that the Court is considering the unsealing of sealed judicial documents.

At the September 4 hearing the Court said expedited briefing would address “what is or is not in any of the three categories,”² i.e., judicial documents, negligibly judicial documents, and non-judicial documents. *See id.* at 21 (Court: indicating that first step is to “consider which category the documents [go] into” and then “there’s a ruling on that”). In the Amended Order entered September 5 the Court directed that parties “submit papers no longer than 5 double-spaced pages . . . arguing for sealing.” Doc.982. We understand this to mean that parties urging continued sealing of *categories* of sealed documents should submit briefing in support of their position for continued sealing of all the documents in that category.

It is relatively straightforward to argue in five or fewer pages why an entire category of sealed documents should remain sealed. It is not possible in five pages to argue why many dozens of admittedly judicial or negligibly judicial documents and/or their attachments and exhibits should remain sealed. A principal reason it is not possible is that proponents of sealing must make “particular objections to unsealing specific materials” so that the Court can “conduct . . . a particularized review” to determine whether “the presumption of public access outweighs any countervailing privacy interests,” *Brown*, 929 F.3d at 51; *see id.* at 48 (holding that district court “failed to review the documents individually and produce specific, on-the-record findings that sealing is necessary to preserve higher values. . . . Instead, the District Court made generalized statements about the record as a whole. This too was legal error.”) (internal quotations and footnote omitted); *id.* at 49 (even when presumption of public access is lower for some judicial documents, “a court must still articulate specific and substantial reasons for sealing

² Tr. of 9/4/2017 Hearing, at 19

such material”). And, as noted, at this stage in the remand proceedings the Court and the parties are only at the first step—trying to determine whether the parties can agree that entire categories of sealed documents should remain sealed.

Standard of Review

Our discussion of the categories is guided by standards for determining what is a judicial document. The mere filing of a document with the court is insufficient to render it a judicial document subject to the right of public access. *Brown*, 929 F.3d at 49. For a document to be a judicial document and subject to a presumption of access by the public, the document must be relevant to the performance of the judicial function and useful in the judicial process. *Id.* A court performs the judicial function when it “rules on motions currently before it” and exercises its inherent supervisory powers. *Id.* A document is relevant to the performance of the judicial function if it reasonably would have a tendency to influence a district court’s ruling on a motion or the exercise of its supervisory powers. *Id.* If a court determines a document is not relevant to the performance of a judicial function, “no presumption of public access attaches.” *Id.*

Once an item is identified as a judicial document, the weight given the presumption of access is governed by the role of the material at issue in the exercise of judicial power “and the resultant value of such information to those monitoring the federal courts.” *Id.* Evidence introduced at trial or in connection with summary judgment enjoys a strong presumption of public access. However, documents that “‘play only a negligible role in the performance of Article III duties’ are accorded only a low presumption that ‘amounts to little more than a prediction of public access absent a countervailing reason.’” *Id.* at 49-50 (quoting *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995)(“*Amodeo II*”). Documents never filed with the court “lie entirely beyond the presumption’s reach.” *Id.* (internal quotations omitted).

DISCUSSION

I. CATEGORY 1: Motions to Compel and Related Motions for Protective Orders and Court Orders

Category 1 captures some 132 docket entries. Each docket entry is a motion to compel, motion for protective order or similar discovery-related request for an order, and responses, replies, declarations and exhibits filed in connection with those motions. This category consists of (1) non-judicial documents, and (2) negligibly judicial documents.

Materials submitted to the court solely so that the court may decide whether they must be disclosed in the discovery process or shielded by a protective order are not judicial documents and therefore are not afforded a presumption of access. *Brown*, 929 F.3d at 49 n.33. Some of the items in Category 1 are such non-judicial documents. *See*, e.g., Docs.141, 370, 806, 830, 841. For example, Doc.370 is a motion for an order protecting from disclosure in the discovery process Ms. Maxwell’s personal financial information.

Other discovery-related court filings in Category 1 “at least on their face,” *Brown*, 929 F.3d at 50, are judicial documents, e.g., motions to compel testimony and to quash trial subpoenas. Accordingly, on their face they “are subject to at least some presumption of public access.” *Id.* (footnote omitted). However, as the Second Circuit observed, the court’s authority to oversee discovery is “ancillary to the court’s core role in adjudicating a case”; “[a]ccordingly, the presumption of public access in filings submitted in connection with discovery disputes . . . is somewhat lower than the presumption applied to materials introduced at trial, or in connection with dispositive motions.” *Id.*

In fact, in the next step when the Court invites the parties to submit substantive arguments on whether judicial documents in the various categories should be unsealed, we intend to demonstrate that the discovery-related submissions are negligibly judicial documents with

only a slight presumption of access that “amounts to little more than a prediction of public access absent a countervailing reason” *id.* at 49-50 (internal quotations omitted). This is true in part because these submissions concerned issues wholly collateral to the lawsuit’s merits. They concerned whether materials to be “passed between the parties”³ were discoverable under the old Rule 26(b)(1), which governed the case at bar. That rule permitted parties to discover any material not privileged regardless of admissibility, so long as the discovery request “appears reasonably calculated to lead to the discovery of admissible evidence,” Fed. R. Civ. P. 26(b)(1) (2015). The Supreme Court amended the rule effective December 1, 2015, to eliminate the “reasonably calculated” language. *See generally* <https://www.americanbar.org/groups/litigation/committees/products-liability/practice/2017/2015-amendments-to-frcp/>. The old Rule 26(b)(1) regime’s low threshold outstanding materials in discovery underscores the non-judicial or negligibly judicial nature of discovery motions and the materials relating to such motions.

Because there are compelling countervailing reasons against unsealing the court submissions in Category 1, the parties, non-parties and the Court will need to proceed to the second step to determine which of the submissions should remain sealed.

II. CATEGORY 2: Motions in Limine re Admissibility of Evidence and Related Orders

In anticipation of a May 2017 trial the parties filed 116 pleadings related to the admissibility of various pieces of evidence. Because it was clear that Plaintiff was attempting to transform the focus of this matter from a 2015 single-count defamation claim against Ms. Maxwell into a *de facto* sex trafficking case against Jeffrey Epstein, allegedly occurring between

³ *Id.* at 50 (internal quotations omitted).

approximately 2000-2008, Ms. Maxwell was forced to move to exclude dozens of items of irrelevant evidence and respond to an equal number of attempts by Plaintiff to introduce clearly inadmissible evidence.⁴ Many of the documents at issue were subject to protective orders in other cases.⁵ Most of the documents were discovered under the Protective Order.

Doc.601 is a good example. There, Plaintiff submitted a Notice which argued that roughly 600 pages of hearsay evidence, virtually all unauthenticated, would be admissible through Fed. R. Evid. 807. Ms. Maxwell pointed out, in Doc.646, the myriad problems with the Notice. Virtually all the hearsay documents were the subject of separate motions *in limine*.

Other types of *limine* motions related to discrete pieces of evidence. For example, Plaintiff sought to introduce an unauthenticated collection of internally inconsistent and obviously manipulated photocopied pages, purportedly obtained from a dead person (who had been convicted of two federal felonies), by one of Plaintiff's lawyers in another case. Thus, Ms. Maxwell was forced to file Doc.679, which corresponds to Plaintiff's Doc.683.

These documents all fall into the category of negligibly judicial documents because they are subject to at least some presumption of public access. *See Brown*, 929 F.3d at 50. The presumption of public access in filings submitted in connection with "motions *in limine* is

⁴ Most, if not all, of the *limine* motions relating to the admissibility of evidence were not ruled on by the Court prior to the case being settled and dismissed. Such "lapsed" motions are non-judicial documents. *See, e.g., Brown*, 929 F.3d at 49 ("court performs a judicial function when it rules on motions currently before it"; a motion is not relevant to judicial function, "no presumption of public access attaches").

⁵ It may well be that some of these documents are no longer subject to a separate protective order and have been released. Ms. Maxwell has not tracked which documents may or may not have been released by another Court and submits that whether that has occurred should not alter the analysis here. Indeed, if the documents have already been released the presumption of access here is diminished by the ability of the public, the media, and Plaintiff to find, and disseminate them from that forum.

generally somewhat lower than the presumption applied to material introduced at trial, or in connection with dispositive motions such as motions for dismissal or summary judgment.” *Id.*

Application of an individualized review of these motions *in limine* weighs in favor of maintaining the status of sealed documents. Virtually all the documents were provided under the Protective Order; the documents invariably relate to third parties; the information attached was generally not considered by the Court as more often than not no rulings were made. Thus, the value of those “monitoring the federal courts,” *id.*, is non-existent.

Most, if not all, of the disputed evidence was inadmissible at trial. Documents sought to be introduced at trial but not admitted are ancillary to the court’s role in adjudicating a case and “the weight of the presumption of access to these materials is diminished.” *United States v. Gatto*, No. 17-CR-686 (LAK), 2019 WL 4194569, at *6 (S.D.N.Y. Sept. 3, 2019).

In *Amodeo II* the court recognized that the personal motivation of the individuals seeking access play a role in the decision to seal or unseal a document. Although the court declined to speculate about the role of journalists, it noted: “Different considerations apply where personal motives, such as an individual vendetta or a quest for competitive economic advantage, are involved. However, we believe these considerations are best weighed as part of an assertion by a person or firm of a right of privacy based on an anticipated injury as a result of disclosure.”

Amodeo II, 71 F.3d at 1050.

It is a curious, distorted, and troubling process that transforms otherwise inadmissible evidence into “judicial documents” that then allows the proponent of the inadmissible evidence to hawk her story with defamation-impunity. A Google search of the name “Giuffre” yields 4,750,000 results and includes dozens of interviews by Plaintiff and her lawyers. The media have failed to heed any of the advice handed down by the Second Circuit in this case but instead quote

whole cloth from false allegations made in court papers. Plaintiff and her lawyers initiated yet another defamation claim, this time against Alan Dershowitz, No. 19 CV 03377, pending before this Court. Their motivation in unsealing the documents is patent, having gone from a participant in the Protection Order when it suited their economic interests, to abandoning it when it does not.⁶

A number of factors warrant continued non-disclosure of these documents: (1) the danger of impairment of law enforcement; (2) judicial efficiency; (3) the privacy interests of those resisting disclosure; and (4) the absence of any actual ruling by the Court related to the various motions. *See, United States v. Gatto*, at *6 recognizing factors 1, 2, 3, and *Brown*, at 50 recognizing factor 4.

The Plaintiff and her lawyers are actively seeking to indict Ms. Maxwell and use information provided pursuant to a protective order to do so. The danger of impairment of law enforcement is high with the death of Mr. Epstein any putative plaintiff can simply copy the unsworn allegations of others in questioned documents and pile on Ms. Maxwell. Witness testimony may be impacted or changed by the serial repetition of the false allegations against Ms. Maxwell and others. The ability to seat a fair and impartial jury in any civil or criminal trial

⁶ <https://www.cbsnews.com/video/jeffrey-epstein-accuser-courtney-wild-speaks-out-about-sex-abuse-charges/>; <https://www.today.com/video/jeffrey-epstein-accusers-detail-abuse-in-nbc-news-exclusive-69459525763>; <https://nypost.com/2019/09/19/jeffrey-epstein-accuser-reacts-to-his-death-i-was-in-mourning/>; <https://nypost.com/2019/09/16/epstein-sex-slave-tried-to-swim-shark-infested-waters-to-escape/>; <https://www.dailymail.co.uk/news/article-7490139/Prince-Andrews-accuser-Virginia-Roberts-says-shattered-belief-good-fairytale-princes.html>; <https://abcnews.go.com/WNT/video/jeffrey-epsteins-accusers-speak-alleged-sexual-abuse-court-65229488>; <https://www.cbsnews.com/video/lawyer-for-epsteins-alleged-victims-there-are-well-in-excess-of-50/>; <https://www.youtube.com/watch?v=3rNlz77uTYQ>; <https://www.insider.com/epstein-sexually-abused-victims-while-serving-jail-time-brad-edwards-2019-7>; <https://www.npr.org/2019/08/12/750395578/epsteins-accusers-plan-to-pursue-legal-options>

is impacted by publicized disclosure of unproven accusations. It is in the interest of judicial efficiency to maintain the status of these documents because of the difficulty associated with a page-by-page line-by-line review of material with a diminished presumption of access, particularly where some 2,000 pages of information related to the summary judgment pleadings have been disclosed. Because no ruling was made by the court related to the majority of the *limine* motions the monitoring interest is minimal. Finally, there are dozens of innocent individuals who have no desire to see their private information exposed to the public. “[T]he privacy interests of innocent third parties ... should weigh heavily in a court’s balancing equation.” *Amodeo II*, at 1051.

III. CATEGORY 3: Motions in Limine re Expert Testimony and Related Orders

The parties filed 48 pleadings (Doc.520-536; 569-575; 577-585; 599-600; 602-603; 611-619; 664; 726-727 and 786) related to the admissibility of all or part of a purported expert’s opinion. Ms. Maxwell generally objected to the attempt to improperly present: inadmissible character evidence; inadmissible hearsay evidence; improper or non-disclosed damages or damage calculations; and inadmissible evidence about the credibility of witnesses, all through the use of alleged expert testimony. Ms. Maxwell also objected to the untimely disclosure of certain testimony, e.g., Doc.521-523; 574-575; 612; 664; 726-727; & 786. Much of the proffered testimonies and purported experts were inadmissible for many overlapping reasons.

The disagreements about who could opine about what required the submission of discovery documents that ordinarily are not filed with the Court. These discovery documents included the various expert reports; excerpts of deposition testimony taken pursuant to the Protective Order; Rule 26(a)(1)(A) disclosures that included the names and addresses of dozens of third parties and alleged damage calculations; financial information including photocopies of checks; and various other materials that had been produced subject to the Protective Order.

The public's right of access is limited to traditionally publicly available sources of information, and “discovered, but not yet admitted, information” is not “a traditionally public source of information.” *Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 33, (1984). At common law, pretrial proceedings were closed to the public, *see Gannett Co., Inc. v. DePasquale*, 443 U.S. 368, 389 (1979), and the federal discovery rules have not changed this common-law tradition. As the Court noted in *Seattle Times*, “[d]iscovery rarely takes place in public,” 467 U.S. at 33 n.19, 104, and the system created by Rule 26 contemplates that the exchange of information will occur with minimal judicial involvement. *See* Fed. R. Civ. P. 26(a)(1)(A) (requiring parties to disclose certain material automatically, regardless whether other litigants have requested it); *id.* 26(c)(1) (party seeking a protective order must certify that it has “in good faith conferred or attempted to confer with other affected parties in an effort to resolve the dispute without court action”). Indeed, it has long been the rule that information exchanged in discovery is *not* filed with the court but simply exchanged between the parties. *See*, e.g., Fed. R. Civ. P. 5(d). Thus, things like depositions, written discovery responses, expert opinions, and documents exchanged among the parties are non-judicial documents. *Amodeo II*, 71 F.3d at 1050.

Unfortunately, Plaintiff weaponized the expert testimony and corresponding disclosures required under Rule 26(a)(2)(B). Ms. Maxwell was, out of necessity, forced to seek pretrial orders from the Court either eliminating or excluding the inadmissible opinions, testimony, and experts. This, in turn, required Ms. Maxwell to attach the offending information. Plaintiff, in turn, attached more offending information to her responses. Thus, the court filings are packed with information generated by the Plaintiff in the discovery process that was largely inadmissible as evidence at trial and, absent the need to obtain court assistance in excluding the testimony, the documents would have never been taken out of the status of clearly non-judicial documents.

Of course, the law in this circuit is clear that the various motions *in limine*, their attendant responses, replies and attachments are in the category of “negligible” judicial documents, *Brown*, 929 F.3d at 49. These are documents that “play only a negligible role in the performance of Article III duties” and are accorded only a low presumption that “amounts to little more than a prediction of public access absent a countervailing reason.” *Id.* at 49-50 (internal quotations and footnote omitted).

Here, there are many countervailing reasons to deny public access, including: the opinions, testimony, and attachments were subject to an agreed upon Protective Order. Ms. Maxwell relied on the Protective Order when seeking assistance from the Court in excluding inadmissible testimony; numerous third parties are identified in the various filings attached to the motions and responses; any testimony attached as an exhibit was obtained pursuant to the guarantee of the Protective Order. The evidence generally would not have been admissible at trial; thus, it was offered for an improper purpose and subject to a motion to strike or exclude. Had Ms. Maxwell **not** been forced to move to exclude the testimony the information would have remained a non-judicial document subject to the Protective Order. The expert opinions objected to were generally “libelous statements for press consumption,” *Brown*, 929 F.3d at 41.

It is important to note that the various experts are presumably free to offer their opinions directly to the media should the Plaintiff wish to authorize the dissemination of these defamatory, unscientific, and unsupportable statements. The Court, however, should not afford this information privileged status or allow the court file to serve as a protected “reservoir” for defamatory material. In addition, the four innumerate factors discussed in Section II, above, apply equally here.

IV. CATEGORY 4: Trial Deposition Designations and Counter-Designations

Most of the potential trial witnesses in this case resided outside the state of New York. A total of 29 depositions occurred and a significant portion of the deposition testimony was designated for use at trial under Rule 32 (a)(6). With the exception of experts, all the deposition testimony was compelled. All the designated deposition testimony was subject to the Protective Order. Most of the witnesses were represented by counsel, and a condition of the appearance at the deposition was that the testimony would remain confidential.

In addition to depositions taken in this case, Plaintiff and her lawyers were also parties to other, either prior or ongoing, litigation with Jeffrey Epstein and Alan Dershowitz. Deposition testimony from witnesses in these matters was also designated for use in this case.

The parties exchanged deposition designations and counter-designations. One set of counter-designations was erroneously filed with the Court. *See* Doc.592. These counter-designations consist of start and end times for the video-recorded deposition testimony of various witnesses.

On April 5, 2017, the parties appeared for a hearing to discuss the objections to the various deposition designations. Plaintiff's counsel attended the hearing with what appeared to be more than a dozen boxes of material, presumably all the deposition transcripts. None of the material was inspected by counsel for Ms. Maxwell. The Court did not hold any hearing on the objections to the various designations and counter designations and counsel for Ms. Maxwell do not know, or recall, what happened to the many boxes with unknown content that we presumed were deposition transcripts. The case was settled and dismissed with prejudice before any ruling was issued. The parties do not know whether Judge Sweet ever reviewed any of the deposition designations, counter-designations, or objections.

If entire unread deposition transcripts remain somewhere within the United States District Court for the Southern District of New York a determination of what to do with the material is necessary.

The deposition designations, counter-designations, and transcripts related to those portions of testimony are non-judicial documents. *Amodeo II*, 71 F.3d at 1050. The fact that transcripts may have been dropped off in the courtroom or transferred electronically does not change the status of the transcripts as non-judicial documents because “the mere filing of a paper or document with the court is insufficient to render that paper a judicial document subject to the right of public access.” *United States v. Gatto*, at *2 (quoting *Brown*, 929 F.3d at 49 (quoting *Amodeo I*, 44 F.3d at 145)).

Portions of the designated testimony were also used as exhibits to the summary judgment briefs. Because the summary judgment materials were deemed judicial documents as a matter of law, the Second Circuit released redacted versions of the transcripts submitted in connection with the summary judgment briefing. *See Brown*, 929 F.3d at 48 n.22: “Upon issuance of our mandate, a minimally redacted version of the summary judgment record will be made accessible on the Court of Appeals docket. We have implemented minimal redactions to protect personally identifying information such as personal phone numbers, contact lists, birth dates, and social security numbers. *We have also redacted the names of alleged minor victims of sexual abuse from deposition testimony and police reports, as well as deposition responses concerning intimate matters where the questions were likely only permitted—and the responses only compelled—because of a strong expectation of continued confidentiality.* *See Fed. R. Civ. P. 5.2.*” (Emphasis added.)

The remaining portions of any transcripts, designations, or counter-designations are nothing more than discovery documents exchanged prior to trial. All of these materials should remain sealed.

V. CATEGORY 5: Objections to Trial Deposition Designations and Counter-Designations

Plaintiff served deposition designations for 14 witnesses for use in her case in chief at trial.⁷ With respect to four of the witnesses, Ms. Maxwell objected to the use of the deposition testimony pursuant to Fed. R. Civ. P. 32 and Fed. R. Evid. 804(b)(1) because either (a) the witnesses were not unavailable and/or (b) the requirements for use of deposition in lieu of live testimony could not be met (Doc.567-568). For example, one of the proposed deponents that Ms. Maxwell sought to exclude, *in toto*, was a dead, twice-convicted felon, who was deposed in an unrelated proceeding (that occurred years before the defamation action) in which Ms. Maxwell was not a party and had no opportunity to question or cross-examine. Discrete excerpts of pages of deposition testimony were attached to Ms. Maxwell's *in toto* objections.

Ms. Maxwell separately filed specific objections with respect to the remaining ten witnesses because the Federal Rules of Evidence required portions, or in some instances all, of the designated testimony to be excluded. Doc.566 is a 107-page submission with specific evidentiary objections to proposed questions and answers of the various deponents. The objections referenced specific start and end times that were objectionable but did not quote or attach the testimony.

Ms. Maxwell objected to various cross or counter-designations in a similar fashion, by referencing start and stop times and lodging specific evidentiary objections. *See* Doc.633. Ms.

⁷ Fourteen pleadings were filed relating to trial deposition testimony: Doc.561-568; 606-607; and 630-633.

Maxwell did not submit what would have been hundreds, if not thousands, of pages of transcripts as part of her objections.

Ms. Maxwell also designated deposition testimony. Plaintiff objected to various deposition designations, including her own testimony in another matter, *see* Docs.563-565, ignoring the fact that these statements were admissions and independently admissible under Fed. R. Evid. 801(d)(2). Plaintiff also objected to the deposition testimony of Mr. Dershowitz *See* Docs.562-564.

In addition to her objections to certain witnesses, Plaintiff filed specific objections to defense-designated testimony by objecting to start and stop times with citations to various rules of evidence. *See* Docs.565 and 630.

The last pleading filed with relation to the deposition designations or counter-designations occurred on February 17, 2017 (Doc.633). At that point transcripts had not been provided to the Court for review.

On or about March 31, 2017, Plaintiff submitted highlighted copies of transcripts to the Court and served Defense counsel with an electronic link to download a copy of what was emailed to the Court. It is unclear what, if anything, happened to the linked documents. Defense counsel assumes the electronically submitted transcripts are the same as the transcripts left with the Court on April 5, 2017. However, no review of what was or was not submitted in paper format ever occurred. It is these electronic and paper copies of transcripts that Ms. Maxwell believes are non-judicial documents as discussed in Category 2, *supra*. If the Court disagrees with the position that the that the dropped-off transcripts are non-judicial documents Ms. Maxwell submits that these transcripts are entitled to no greater presumption of access than other

discovery documents provided for reference to resolve a dispute regarding admissibility, *i.e.*, negligible.

No hearing was held regarding the objections to designations and no ruling was made by the Court on any of the designations, counter-designations, or objections. Accordingly, they are non-judicial documents. *See Brown*, 929 F. 3d at 49.

Even if they were negligibly judicial documents they should remain sealed. These documents all fall into the category of negligible judicial documents because they are subject to at least some presumption of public access. *Id.*, at 50. The presumption of public access in filings submitted in connection with “motions *in limine* is generally somewhat lower than the presumption applied to material introduced at trial, or in connection with dispositive motions such as motions for dismissal or summary judgment.” *Id.*

Application of an individualized review of these objections to deposition testimony weighs in favor of maintaining the status of sealed documents. The pleadings by and large are start and stop times with citations to the Federal Rules of Evidence. All of the underlying testimony was provided under the Protective Order; most of it was compelled; the documents and testimony relate to third parties and additional non-parties; the information attached was generally not considered by the Court as more often than not no rulings were made. Thus, the value of those “monitoring the federal courts,” *id.*, is non-existent.

VI. CATEGORY 6: Filings Related to Third-Party Intervenors and Related Orders

The appeal giving rise to the current remand proceedings was initiated by several intervenors to this action, including Professor Alan Dershowitz and members of the press, Mr. Michael Cernovich and Ms. Julie Brown. The docket contains filings related to those intervenors right to intervene and their applications for the unsealing of materials, many of which contain

either redactions or sealed attachments. *See, e.g.*, Docs.362-64, 406-408, 435-36, 447, 922, 928, 933 & 947. Because they also were attached to summary judgment pleadings, some of those sealed attachments have already been unsealed by the Second Circuit in *Brown*. *E.g.*, Doc.363, Ex. B (“The Billionaire Playboys Club” ‘manuscript’). Many, however, remain sealed.

The submissions requesting the Court to take action with respect to intervention and unsealing qualify as “judicial documents” under the *Brown* test. The weight of any presumption of access is diminished because the intervention papers were “ancillary to the court’s core role in adjudicating a case.” *Brown*, 929 F.3d at 50. For the most part, the sealed documents implicate the privacy interests of non-parties, a significant countervailing factor to their unsealing.

Other documents attached to Plaintiff’s opposition to intervention are not judicial documents. These exhibits and accompanying text were not “relevant to the performance of the judicial function,” and thus were not “judicial documents” and were not entitled to any presumption of public access. *See id.* *Brown* at 51-52 & n.12. Many were wholly immaterial to the question of intervention or sealing. For example, in opposition Mr. Dershowitz’s original application to intervene, Plaintiff attached numerous sealed filings and pleadings related to a wholly separate lawsuit between Plaintiff’s counsel and Mr. Dershowitz in Florida state court, including confidential deposition testimony, other sealed filings, and motions to strike. Docs.407-08. Those documents had already been designated and treated as confidential in a completely different action to which Ms. Maxwell was not a party, and as to some, the Florida court had ruled on motions to strike. The exhibits and accompanying argument were immaterial to the question of intervention and unsealing presented to Judge Sweet and should remain sealed as non-judicial documents.

VII. CATEGORY 7: Filings Related to Third-Party (Other Than Intervenors) – and Related Orders

Numerous non-parties found themselves the subjects of, or engaged in, discovery and other disputes in the course of the underlying litigation. These included motions to compel testimony, to comply with subpoenas *duces tecum*, and for protective orders.⁸

Any and all arguments concerning Motions to Compel, *supra* Category 1, are incorporated herein by reference. As the *Brown* court ruled, discovery disputes are afforded status as a judicial document, but the presumption of access is “generally somewhat lower” than that afforded dispositive motions or evidence introduced at trial. Moreover, because the privacy rights of non-parties are involved, per the Second Circuit’s direction, any such non-party should be given notice and opportunity to be heard on any countervailing arguments regarding their disclosure. Additionally, many of the attachments to these third party pleadings are of the type normally exchanged between the parties but not filed in Court, such as Rule 26 disclosures with witness names and addresses, or discovery responses. *See Brown*, 929 F.3d at n.33 (holding “material that is submitted to the court solely so that the court may decide whether that same material must be disclosed in the discovery process or shielded by a Protective Order” are non-judicial documents); *id.* at 50 (documents “never filed with the court, but simply passed between the parties in discovery, lie entirely beyond the presumption’s reach”)(quoting *Amodeo II*).

Here, many third parties were compelled to participate in the discovery process with promises of confidentiality and irrespective of whether they ultimately had admissible or inadmissible evidence. Also, their privacy rights, recognized by the *Brown* court, which redacted

⁸ Docs.309, 311, 449-50, 470-71, 473-74, 591, 640-41, 653-57, 700-01, 707-09, 712-15, 761, 873-77, 888, 896-97, 908-09

names and often details form summary judgment materials (*id.* at n.22), apply with even greater force to these non-adjudicatory, weak-presumption documents.

VIII. CATEGORY 8: Case Management Documents

Sprinkled throughout the trial court docket are various filings pertaining merely to the Court's management of the case which are thus entitled to a very weak presumption of access. Moreover, many of those filings contained exhibits not "relevant to the performance of the judicial function," which are neither "judicial documents" nor entitled to any presumption of public access.

Case management documents include the parties' requests seeking minor extensions of time (e.g., undocketed letter motions and Docs.306-07), motions for leave to serve subpoenas by means other than personal service (Docs.160-61), notices to redact transcripts (Docs.721, 796, 823, 840, 894), joint pretrial statements (Docs.622, 859) or a motion for additional depositions (Docs.172-73). In many cases, Plaintiff attached to these ministerial pleadings substantial quantities of documents irrelevant to the Court's case management analysis. By way of example, Plaintiff's May 27, 2016 Motion to Exceed Presumptive Ten Deposition Limit was accompanied by exhibits totaling 803 pages, including the entire confidential deposition transcripts of the two witnesses she had deposed to that point (Doc.173, Exs. 5-6).⁹

As the *Brown* court recognized, to merit any presumption of access, "the item filed must be relevant to the performance of the judicial function and useful in the judicial process in order for it to be designated a judicial document." *Brown*, 929 F.3d at 49 (citing *United States v. Amodeo*, 44 F.3d 141, 145 (2d Cir. 1995)) ("*Amodeo I*"). If "a court determines that documents

⁹ The balance of the 800 pages (not filed under seal) included voluminous correspondence among counsel regarding scheduling of the depositions, the entire Jeffrey Epstein Palm Beach police report, and another deposition transcript taken in another proceeding to which neither Plaintiff nor Ms. Maxwell were parties or participants.

filed by a party are *not* relevant to the performance of a judicial function, no presumption of public access attaches.” *Id.*

Case management documents “play only a negligible role in the performance of Article III duties” and thus should be “accorded only a low presumption that amounts to little more than a prediction of public access absent a countervailing reason.” *Id.* at 49-50. Whether an extension of time is granted, or a witness is served a subpoena by alternate means, or the Court permits additional depositions, are the type of negligible judicial duties situated far down the continuum from adjudicating the merits of a dispositive motion. Many Article III judges, in fact, routinely delegate such ministerial acts to magistrate judges. Items such as Notices or Joint Pretrial Statements, essentially a recitation of the anticipated issues for trial, names of witnesses, and defenses, do not call upon the Court to take any action and therefore also fall into the negligibly judicial documents entitled to weak-presumption status.

Finally, many of the documents attached to the case management pleadings are “redundant, immaterial, impertinent, [and/]or scandalous,” were “not relevant to the performance of the judicial function,” and therefore should be afforded no presumption of access and either stricken or kept under seal, without the need for third parties to weigh in on privacy interests or the further balancing of any competing interests.

IX. CATEGORY 9: Adverse Inferences/ Sanction Motions/ Motion to Strike or Exclude Evidence

As we understand Category, it captures numerous submissions by the original parties for remedies for various alleged infractions and misconduct relating to discovery and other matters. Plaintiff Giuffre’s counsel proposed this category. We think it is unnecessary. It is entirely duplicative of documents that we would include in Categories 1 and 2, which consist of discovery-related motions and motions related to the admissibility of evidence. Accordingly, we

incorporate by reference our discussion, above, of Categories 1 and 2. As contemplated by Plaintiff's counsel, we believe the submissions would range from non-judicial documents to negligibly judicial documents.

Conclusion

The Court should determine that Category 4 consists of non-judicial documents that should remain sealed. The remaining categories, which contain both non-judicial documents and negligibly judicial documents, should be addressed in Step 2 using the standards set forth in *Brown*.

Dated: September 25, 2019.

Respectfully submitted,

/s/Jeffrey S. Pagliuca

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CERTIFICATE OF SERVICE

I certify that on September 25, 2019, I electronically served this *Ms. Maxwell's Brief in Support of Maintaining Documents Under Seal* via ECF on the following:

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APPENDIX

Defendant Maxwell - Categories Reflected in Docket Entries:

1. Motions to Compel and Related Motions for Protective Orders and Court Orders (“Motion to Compel”)
2. Motions in Limine re. Admissibility of Evidence and Related Orders (“Motion in Limine re. Admissibility of Evidence”)
3. Motions in Limine re. Expert Testimony and Related Orders (“Motion in Limine re. Expert”)
4. Deposition Designations and Counter-Designations
5. Objections to Designations and Counter-Designations
6. Pleadings related to Third-Party Intervenors and Related Orders (“Pleadings re. Third-Party – Intervenors”)
7. Pleadings related to Third-Party – Other – and Related Orders (“Pleadings re. Third-Party – Other”)
8. Case Management Pleadings and Related Orders (“Case Management”)
9. Evidence and Motions filed for an Improper Purpose or Subject to a Motion to Strike or Exclude (“Improper Purpose”)

Date Filed	DE	Category	Docket Text
04/04/2016	79	Motion to Compel Exhibit 4 Restricted	DECLARATION of Sigrid S. McCawley in Opposition re: 75 MOTION to Compel <i>Responses to Defendant's First Set of Discovery Requests to Plaintiff</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit)
04/25/2016	121	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: 96 MOTION for Clarification of Court's Order and For Forensic Examination. <i>REDACTED</i> filed by Virginia L. Giuffre.
04/25/2016	122	Motion to Compel Improper Purpose Ex. 4, 7, 8	DECLARATION of Sigrid McCawley in Support re: 96 MOTION for Clarification of Court's Order and For Forensic Examination filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit <i>REDACTED</i> , # 5 Exhibit, # 6 Exhibit, # 7 Exhibit <i>REDACTED</i> , # 8 Exhibit <i>REDACTED</i>)
05/02/2016	135	Motion to Compel	<i>REDACTED</i> OPINION #106433 re: 33 MOTION to Compel Defendant Ghislaine Maxwell to Produce Documents Subject to Improper Claim of Privilege.

05/04/2016	<u>139</u>	Motion to Compel	RESPONSE re: <u>134</u> Order, <i>Redacted</i> filed by Virginia L. Giuffre.
05/04/2016	<u>140</u>	Motion to Compel Improper Purpose Ex. 1	DECLARATION of Sigrid McCawley re: <u>139</u> Response, DECLARATION of Sigrid McCawley in Support filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit Redacted, # <u>2</u> Exhibit, # <u>3</u> Exhibit)
05/04/2016	<u>141</u>	Motion to Compel Improper Purpose - In Camera Materials	NOTICE of In Camera Submission re: <u>134</u> Order,, Document filed by Virginia L. Giuffre.
05/05/2016	<u>143</u>	Motion to Compel	MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Virginia L. Giuffre.
05/05/2016	<u>144</u>	Motion to Compel Improper Purpose Exs. 1, 2, 4, 5, 6, 7	DECLARATION of Sigrid McCawley in Support re: <u>143</u> MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit Redacted, # <u>2</u> Exhibit Redacted, # <u>3</u> Exhibit, # <u>4</u> Exhibit Redacted, # <u>5</u> Exhibit Redacted, # <u>6</u> Exhibit Redacted, # <u>7</u> Exhibit Redacted)
05/10/2016	<u>149</u>	Motion to Compel	RESPONSE to Motion re: <u>143</u> MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Ghislaine Maxwell.
05/10/2016	<u>150</u>	Motion to Compel Ex. A	DECLARATION of Jeffrey S. Pagliuca in Opposition re: <u>143</u> MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Ghislaine Maxwell. (Attachments: # <u>1</u> Exhibit A)
05/11/2016	<u>152</u>	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: <u>143</u> MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Virginia L. Giuffre.
05/11/2016	<u>153</u>	Motion to Compel Improper Purpose Ex. 1	DECLARATION of Sigrid McCawley in Support re: <u>143</u> MOTION to Compel Defendant Ghislaine Maxwell to Answer Deposition Questions <i>Redacted</i> filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit 1 Redacted, # <u>2</u> Exhibit 2 Part 1, # <u>3</u> Exhibit 2 Part 2, # <u>4</u> Exhibit 2 Part 3, # <u>5</u> Exhibit 3 Part 1, # <u>6</u> Exhibit 3 Part 2, # <u>7</u> Exhibit 4, # <u>8</u> Exhibit 5, # <u>9</u> Exhibit 6, # <u>10</u> Exhibit 7)

05/20/2016	155	Motion to Compel	MOTION to Compel <i>Non-Privileged Documents</i> filed by Ghislaine Maxwell.
05/20/2016	156	Motion to Compel Redacted- Ex. E, J	DECLARATION of Laura A. Menninger in Support re: 155 MOTION to Compel <i>Non- Privileged Documents</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E REDACTED, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J REDACTED)
05/25/2016	160	Case Management	MOTION for Leave to Serve Three Deposition Subpoenas by Means Other Than Personal Service <i>Redacted</i> filed by Virginia L. Giuffre.
05/25/2016	161	Case Management Improper Purpose Ex. 2	DECLARATION of Sigrid McCawley in Support re: 160 MOTION for Leave to Serve Three Deposition Subpoenas by Means Other Than Personal Service <i>Redacted</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Composite Exhibit 1, # 2 Exhibit 2 Redacted, # 3 Composite Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Composite Exhibit 9)
05/26/2016	164	Motion to Compel	MOTION to Compel <i>all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</i> filed by Ghislaine Maxwell. (Menninger, Laura)
05/26/2016	165	Motion to Compel Ex. C, H, J, K	DECLARATION of Laura A. Menninger in Support re: 164 MOTION to Compel <i>all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K, # 12 Exhibit L, # 13 Exhibit M, # 14 Exhibit N, # 15 Exhibit O, # 16 Exhibit P, # 17 Exhibit Q)
05/27/2016	172	Case Management	MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Virginia L. Giuffre.
05/27/2016	173	Case Management Improper Purpose Ex 5, 6	DECLARATION of Sigrid McCawley in Support re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5 Redacted, # 6 Exhibit 6 Redacted, # 7 Exhibit 7 Part 1, # 8 Exhibit 7 Part 2, # 9 Exhibit 8, # 10 Exhibit 9)

05/31/2016	179	Motion to Compel	RESPONSE in Opposition to Motion re: 155 MOTION to Compel <i>Non-Privileged Documents</i> filed by Virginia L. Giuffre.
05/31/2016	180	Motion to Compel Ex. 1, 2, 3, 5, 6 Improper Purpose as to Ex. 6	DECLARATION of Meredith L. Schultz in Opposition re: 155 MOTION to Compel <i>Non-Privileged Documents</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Redacted, # 2 Exhibit Redacted, # 3 Exhibit Redacted, # 4 Exhibit, # 5 Redacted, # 6 Redacted, # 7 Exhibit)
06/01/2016	184	Motion to Compel	RESPONSE in Opposition to Motion re: 164 MOTION to Compel <i>all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</i> . Document filed by Virginia L. Giuffre.
06/01/2016	185	Motion to Compel Improper Purpose Ex. 2, 3, 11, 13, 14-16	DECLARATION of Sigrid S. McCawley in Opposition re: 181 LETTER MOTION to Seal Document 164 MOTION to Compel <i>all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</i> , addressed to Judge Robert W. Sweet from Meredith Schultz dated 06/01/16 filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2 Sealed, # 3 Exhibit 3 Sealed, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6, # 7 Exhibit 7, # 8 Exhibit 8, # 9 Exhibit 9, # 10 Exhibit 10, # 11 Exhibit 11 Sealed, # 12 Exhibit 12, # 13 Exhibit 13 Sealed, # 14 Exhibit 14 Sealed, # 15 Exhibit 15 Sealed, # 16 Exhibit 16 Sealed)
06/06/2016	189	Case Management	RESPONSE in Opposition to Motion re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Ghislaine Maxwell.
06/06/2016	190	Case Management Ex. A	DECLARATION of Laura A. Menninger in Opposition re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
06/06/2016	191	Motion to Compel	REPLY to Response to Motion re: 155 MOTION to Compel <i>Non-Privileged Documents</i> , filed by Ghislaine Maxwell.
06/06/2016	192	Motion to Compel Ex. K, L, M	DECLARATION of Laura A. Menninger in Support re: 155 MOTION to Compel <i>Non- Privileged Documents</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit K, # 2 Exhibit L, # 3 Exhibit M)

06/06/2016	194	Motion to Compel Ex. S	DECLARATION of Laura A. Menninger in Support re: 164 MOTION to Compel <i>all Attorney-Client Communications and Work Product Put At Issue by Plaintiff and Her Attorneys</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit Q, # 2 Exhibit R, # 3 Exhibit S)
06/13/2016	203	Case Management	RESPONSE in Support of Motion re: 202 LETTER MOTION to Seal Document <i>re Reply</i> addressed to Judge Robert W. Sweet from Meredith Schultz dated 06/13/2016., 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Virginia L. Giuffre.
06/13/2016	204	Case Management Improper Purpose Ex. 1-3	DECLARATION of Sigrid S. McCawley in Support re: 202 LETTER MOTION to Seal Document <i>re Reply</i> addressed to Judge Robert W. Sweet from Meredith Schultz dated 06/13/2016., 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 (Sealed), # 2 Exhibit 2 (Sealed), # 3 Exhibit 3 (Sealed))
06/14/2016	211	Case Management	REPLY to Response to Motion re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> . <i>CORRECTED</i> filed by Virginia L. Giuffre.
06/14/2016	212	Case Management Improper Purpose Ex. 1-3	DECLARATION of Meredith L Schultz in Support re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit SEALED, # 2 Exhibit SEALED, # 3 Exhibit SEALED)
06/17/2016	224	Case Management	REPLY to Response to Motion re: 172 MOTION To Exceed Presumptive Ten Deposition Limit <i>Redacted</i> . <i>AMENDED</i> filed by Virginia L. Giuffre.
06/20/2016	228	Motion to Compel	RESPONSE in Opposition to Motion re: 199 MOTION for Extension of Time <i>to Complete Depositions</i> filed by Ghislaine Maxwell.
06/20/2016	229	Motion to Compel Ex. A, B, D, J, K, L	DECLARATION of Laura A. Menninger in Opposition re: 199 MOTION for Extension of Time <i>to Complete Depositions</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K, # 12 Exhibit L, # 13 Exhibit M, # 14 Exhibit N)
06/20/2016	230	Motion to Compel	MOTION to Reopen Deposition of Plaintiff Virginia Giuffre filed by Ghislaine Maxwell.

06/20/2016	<u>231</u>	Motion to Compel	MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a) filed by Ghislaine Maxwell.
06/20/2016	<u>232</u>	Motion to Compel Ex. G, H, I, J, K	DECLARATION of Laura A. Menninger in Support re: <u>231</u> MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a) filed by Ghislaine Maxwell. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit J, # <u>11</u> Exhibit K, # <u>12</u> Exhibit L, # <u>13</u> Exhibit M, # <u>14</u> Exhibit N)
06/21/2016	<u>235</u>	Motion to Compel Ex. D-K, M-N	DECLARATION of Laura A. Menninger in Support re: <u>230</u> MOTION to Reopen Deposition of Plaintiff Virginia Giuffre filed by Ghislaine Maxwell. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit K, # <u>11</u> Exhibit L, # <u>12</u> Exhibit M, # <u>13</u> Exhibit N)
06/22/2016	<u>246</u>	Motion to Compel	RESPONSE in Opposition to Motion re: <u>215</u> MOTION to Quash subpoena of Sharon Churcher filed by Ghislaine Maxwell.
06/22/2016	<u>247</u>	Motion to Compel Ex. B-C	DECLARATION of Laura A. Menninger in Opposition re: <u>215</u> MOTION to Quash subpoena of Sharon Churcher filed by Ghislaine Maxwell. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D)
06/22/2016	<u>248</u>	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: <u>199</u> MOTION for Extension of Time to Complete Depositions. REDACTED filed by Virginia L. Giuffre.
06/22/2016	<u>249</u>	Motion to Compel Improper Purpose - Ex. 4, 13-15	DECLARATION of Sigrid McCawley in Support re: <u>199</u> MOTION for Extension of Time to Complete Depositions filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Exhibit, # <u>4</u> Exhibit REDACTED, # <u>5</u> Exhibit, # <u>6</u> Exhibit, # <u>7</u> Exhibit, # <u>8</u> Exhibit, # <u>9</u> Exhibit, # <u>10</u> Exhibit, # <u>11</u> Exhibit, # <u>12</u> Exhibit, # <u>13</u> Exhibit REDACTED, # <u>14</u> Exhibit REDACTED, # <u>15</u> Exhibit REDACTED)
06/28/2016	<u>257</u>	Motion to Compel	RESPONSE in Opposition to Motion re: <u>231</u> MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a). REDACTED filed by Virginia L. Giuffre.

06/28/2016	<u>258</u>	Motion to Compel Improper Purpose Ex. 1-10	DECLARATION of Sigrid McCawley in Opposition re: <u>231</u> MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a) filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit REDACTED, # <u>2</u> Exhibit REDACTED, # <u>3</u> Exhibit REDACTED, # <u>4</u> Exhibit REDACTED, # <u>5</u> Exhibit REDACTED, # <u>6</u> Exhibit REDACTED, # <u>7</u> Exhibit REDACTED, # <u>8</u> Exhibit REDACTED, # <u>9</u> Exhibit REDACTED, # <u>10</u> Errata REDACTED)
06/28/2016	<u>259</u>	Motion to Compel	RESPONSE in Opposition to Motion re: <u>230</u> MOTION to Reopen Deposition of Plaintiff Virginia Giuffre. REDACTED filed by Virginia L. Giuffre.
06/28/2016	<u>260</u>	Motion to Compel Improper Purpose Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: <u>230</u> MOTION to Reopen Deposition of Plaintiff Virginia Giuffre filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Exhibit REDACTED, # <u>2</u> Exhibit REDACTED)
07/01/2016	<u>261</u>	Motion to Compel	RESPONSE in Opposition to Motion re: <u>231</u> MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a). REDACTED-CORRECTED filed by Virginia L. Giuffre.
07/05/2016	<u>263</u>	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: <u>215</u> MOTION to Quash subpoena of Sharon Churcher filed by Sharon Churcher. (Feder, Eric) (07/05/2016)
07/05/2016	<u>264</u>	Motion to Compel	NOTICE of FILING REDACTED OPINION filed by Virginia L. Giuffre. (Attachments: # <u>1</u> Text of Proposed Order Proposed Redacted Opinion)
07/08/2016	<u>267</u>	Motion to Compel	REPLY to Response to Motion re: <u>230</u> MOTION to Reopen Deposition of Plaintiff Virginia Giuffre filed by Ghislaine Maxwell.
07/08/2016	<u>268</u>	Motion to Compel Ex. O-P	DECLARATION of Laura A. Menninger in Support re: <u>230</u> MOTION to Reopen Deposition of Plaintiff Virginia Giuffre filed by Ghislaine Maxwell. (Attachments: # <u>1</u> Exhibit O, # <u>2</u> Exhibit P)

07/08/2016	269	Motion to Compel	REPLY to Response to Motion re: 231 MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a) filed by Ghislaine Maxwell.
07/08/2016	270	Motion to Compel Ex. O-R, T	DECLARATION of Laura A. Menninger in Support re: 231 MOTION for Sanctions 37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a) filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit O, # 2 Exhibit P, # 3 Exhibit Q, # 4 Exhibit R, # 5 Exhibit S, # 6 Exhibit T)
07/12/2016	272	Motion to Compel Improper Purpose Ex. 1-8	LETTER MOTION for Leave to File Sur-Reply addressed to Judge Robert W. Sweet from Sigrid McCawley dated July 12, 2016 filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED Sur-Reply, # 2 Exhibit REDACTED Declaration, # 3 Exhibit REDACTED Exhibit 1, # 4 Exhibit REDACTED Exhibit 2, # 5 Exhibit REDACTED Exhibit 3, # 6 Exhibit REDACTED Exhibit 4, # 7 Exhibit REDACTED Exhibit 5, # 8 Exhibit REDACTED Exhibit 6, # 9 Exhibit REDACTED Exhibit 7, # 10 Exhibit REDACTED Exhibit 8)
07/13/2016	279	Improper Purpose (Motion to Strike filed at DE 288)	MOTION for Sanctions <i>Motion for Adverse Inference Instruction REDACTED</i> filed by Virginia L. Giuffre.
07/13/2016	280	Improper Purpose (Motion to Strike filed at DE 288) Ex. 1-2	DECLARATION of Meredith Schultz in Support re: 279 MOTION for Sanctions <i>Motion for Adverse Inference Instruction REDACTED</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit)
07/18/2016	290	Improper Purpose (Motion to Strike filed at DE 288)	LETTER RESPONSE in Opposition to Motion addressed to Judge Robert W. Sweet from Meredith Schultz dated July 18, 2016 re: 288 LETTER MOTION for Discovery to Strike Plaintiff Virginia Giuffre's Motion for an Adverse Inference Instruction Pursuant to Rule 37(b), (e), and (f), Fed.R.Civ.P addressed to Judge Robert W. Sweet from Laura A. Menninger dated June 15, 201 REDACTED filed by Virginia L. Giuffre.
07/18/2016	291	Improper Purpose (Motion to Strike filed at DE 288) Ex. 1-3	DECLARATION of Meredith Schultz in Opposition re: 288 LETTER MOTION for Discovery to Strike Plaintiff Virginia Giuffre's Motion for an Adverse Inference Instruction Pursuant to Rule 37(b), (e), and (f), Fed.R.Civ.P addressed to Judge Robert W. Sweet from Laura A. Menninger dated June 15, 201 filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED)
07/25/2016	303	Motion to Compel	REPLY to Response to Motion re: 272 LETTER MOTION for Leave to File Sur-Reply addressed to Judge Robert W. Sweet from Sigrid McCawley dated July 12, 2016. <i>Defendant's Sur Sur-Reply In Support of Motion for Rule 37(b) & (c) Sanctions</i> filed by Ghislaine Maxwell.

07/25/2016	304	Motion to Compel Ex. U-X	DECLARATION of Laura A. Menninger in Support re: 231 MOTION for Sanctions <i>37(b) & (c) for Failure to Comply with Court Order and Failure to Comply with Rule 26(a)</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit U, # 2 Exhibit V, # 3 Exhibit W, # 4 Exhibit X)
07/25/2016	306	Case Management	MOTION for Extension of Time to Complete Discovery <i>to Serve and Depose Ross Gow</i> filed by Virginia L. Giuffre.
07/25/2016	307	Case Management Ex. 7-8	DECLARATION of Meredith Schultz in Support re: 306 MOTION for Extension of Time to Complete Discovery <i>to Serve and Depose Ross Gow</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit REDACTED, # 8 Exhibit REDACTED, # 9 Exhibit)
07/25/2016	309	Pleadings re. Third-Party-Other	DECLARATION of Meredith Schultz in Support re: 308 MOTION for Sanctions <i>and finding Civil Contempt against Sarah Kellen for Ignoring Subpoena</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit)
07/25/2016	311	Pleadings re. Third-Party-Other	DECLARATION of Meredith Schultz in Support re: 310 MOTION for Sanctions <i>and for Finding of Civil Contempt Against Nadia Marcinkova for Ignoring Subpoena</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit)
07/29/2016	313	Motion to Compel	NOTICE of Supplemental Authority re: 257 Response in Opposition to Motion filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED)
07/29/2016	315	Motion to Compel	FILING ERROR – WRONG EVENT TYPE SELECTED FROM MENU – MOTION to Compel <i>and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions</i> filed by Virginia L. Giuffre. Modified on 8/10/2016.
07/29/2016	316	Motion to Compel Improper Purpose Ex. 1-8	FILING ERROR - DEFICIENT DOCKET ENTRY - DECLARATION of Meredith Schultz in Support re: 315 MOTION to Compel <i>and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED, # 5 Exhibit REDACTED, # 6 Exhibit REDACTED, # 7 Exhibit REDACTED, # 8 Exhibit REDACTED) Modified on 8/10/2016.

08/01/2016	320	Motion to Compel	MOTION Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With Court Order Concerning Forensic Examination Of Devices filed by Ghislaine Maxwell.
08/01/2016	321	Motion to Compel Ex. A-F	DECLARATION of Laura A. Menninger in Support re: 320 MOTION Defendant's Submission Regarding "Search Terms" And Notice Of Compliance With Court Order Concerning Forensic Examination Of Devices filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F)
08/08/2016	335	Motion to Compel	MOTION for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information. Document filed by Virginia L. Giuffre.
08/08/2016	336	Motion to Compel Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 335 MOTION for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED)
08/08/2016	338	Motion to Compel / Improper Purpose (Motion to Strike filed at DE 353)	MEMORANDUM OF LAW in Support re: 279 MOTION for Sanctions Motion for Adverse Inference Instruction REDACTED. Supplement Based on New Information filed by Virginia L. Giuffre. (Attachments: # 1 REDACTED DECLARATION, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED, # 5 Exhibit REDACTED, # 6 Exhibit REDACTED, # 7 Exhibit REDACTED, # 8 Exhibit REDACTED, # 9 Exhibit REDACTED, # 10 Exhibit REDACTED)
08/08/2016	339	Motion to Compel	RESPONSE in Opposition to Motion re: 315 MOTION to Compel and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions filed by Ghislaine Maxwell.
08/08/2016	340	Motion to Compel Ex. A, C-I	DECLARATION of Jeffrey S. Pagliuca in Opposition re: 315 MOTION to Compel and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I)
08/09/2016	345	Motion to Compel	MOTION to Compel Defendant to Produce Documents Subject to Improper Objection and Improper Claim of Privilege filed by Virginia L. Giuffre.

08/09/2016	346	Motion to Compel Ex. 1-5	DECLARATION of Meredith Schultz in Support re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED, # 5 Exhibit REDACTED)
08/10/2016	353	Motion to Compel	MOTION to Strike Document No. [338, and all supporting documents] to <i>Plaintiff's Supplement to Motion for Adverse Inference Instruction Based on New Information</i> filed by Ghislaine Maxwell.
08/10/2016	354	Motion to Compel	MOTION to Compel <i>Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions</i> filed by Ghislaine Maxwell.
08/10/2016	355	Motion to Compel Ex. B	DECLARATION of Laura A. Menninger in Support re: 354 MOTION to Compel <i>Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B)
08/11/2016	356	Motion to Compel	MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL</i> filed by Virginia L. Giuffre.
08/11/2016	357	Motion to Compel Improper Purpose Ex. 1-8	FILING ERROR - WRONG EVENT TYPE SELECTED FROM MENU - MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS [SCHULTZ DECLARATION ISO_DE 356_MOTION]</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2 (Sealed), # 3 Exhibit 3 (Sealed), # 4 Exhibit 4 (Sealed), # 5 Exhibit 5 (Sealed), # 6 Exhibit 6 (Sealed), # 7 Exhibit 7 (Sealed), # 8 Exhibit 8 (Sealed)) Modified on 8/12/2016
08/11/2016	363	Pleadings re. Third-Party Intervenors Improper Purpose Ex. A-B, G, M	DECLARATION of Alan M. Dershowitz in Support re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> . Document filed by Alan M. Dershowitz. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K, # 12 Exhibit L, # 13 Exhibit M, # 14 Exhibit N) (Celli, Andrew)
08/11/2016	364	Pleadings Re. Third-Party Intervenors	MEMORANDUM OF LAW in Support re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> filed by Alan M. Dershowitz. (Celli, Andrew)

08/12/2016	367	Motion to Compel Improper Purpose - Ex. 1-8	DECLARATION of Meredith Schultz in Support re: 357 MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS [SCHULTZ DECLARATION ISO_DE 356_MOTION]</i> ., 315 MOTION to Compel <i>and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions.</i> , 356 MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL.</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 (Sealed), # 2 Exhibit 2 (Sealed), # 3 Exhibit 3 (Sealed), # 4 Exhibit 4 (Sealed), # 5 Exhibit 5 (Sealed), # 6 Exhibit 6 (Sealed), # 7 Exhibit 7 (Sealed), # 8 Exhibit 8 (Sealed))
08/12/2016	368	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: 315 MOTION to Compel <i>and Motion to Enforce the Court's Order and Direct Defendant to Answer Deposition Questions.</i> , 357 MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS [SCHULTZ DECLARATION ISO_DE 356_MOTION]</i> , 356 MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS FILED UNDER SEAL.</i> . Document filed by Virginia L. Giuffre.
08/12/2016	369	Motion to Compel Ex. 1-16 Improper Purpose as to Ex. 2-16	DECLARATION of Sigrid McCawley in Support re: 357 MOTION to Direct <i>DEFENDANT TO ANSWER DEPOSITION QUESTIONS [SCHULTZ DECLARATION ISO_DE 356_MOTION]</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED, # 5 Exhibit REDACTED, # 6 Exhibit REDACTED, # 7 Exhibit REDACTED, # 8 Exhibit REDACTED, # 9 Exhibit REDACTED, # 10 Exhibit REDACTED, # 11 Exhibit REDACTED, # 12 Exhibit REDACTED, # 13 Exhibit REDACTED, # 14 Exhibit REDACTED, # 15 Exhibit REDACTED, # 16 Exhibit REDACTED)
08/12/2016	370	Motion to Compel Ex. C	MOTION for Protective Order (<i>REDACTED</i>) <i>Regarding Personal Financial Information</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
08/12/2016	371	Motion to Compel Ex. C	DECLARATION of Laura A. Menninger in Support re: 370 MOTION for Protective Order (<i>REDACTED</i>) <i>Regarding Personal Financial Information</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
08/17/2016	378	Motion to Compel	RESPONSE in Opposition to Motion re: 354 MOTION to Compel <i>Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions</i> filed by Virginia L. Giuffre.

08/17/2016	379	Motion to Compel Ex.1, 3-6	DECLARATION of Sigrid McCawley in Opposition re: 354 MOTION to Compel <i>Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Redacted, # 2 Exhibit, # 3 Exhibit Redacted, # 4 Exhibit Redacted, # 5 Exhibit Redacted, # 6 Exhibit Redacted)
08/18/2016	380	Motion to Compel	RESPONSE in Opposition to Motion re: 335 MOTION for Protective Order <i>and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information</i> filed by Ghislaine Maxwell.
08/18/2016	381	Motion to Compel Ex. A-H	DECLARATION of Laura A. Menninger in Opposition re: 335 MOTION for Protective Order <i>and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5
08/19/2016	383	Motion to Compel	RESPONSE in Opposition to Motion re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Ghislaine Maxwell.
08/19/2016	384	Motion to Compel Ex. A	DECLARATION of Laura A. Menninger in Opposition re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
08/19/2016	385	Motion to Compel	DECLARATION of REDACTED in Opposition re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Ghislaine Maxwell.
08/19/2016	386	Motion to Compel	DECLARATION of REDACTED in Opposition re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Ghislaine Maxwell.
08/19/2016	387	Motion to Compel	DECLARATION of REDACTED in Opposition re: 345 MOTION to Compel Defendant to Produce Documents <i>Subject to Improper Objection and Improper Claim of Privilege</i> filed by Ghislaine Maxwell.
08/22/2016	388	Motion to Compel	RESPONSE in Opposition to Motion re: 370 MOTION for Protective Order (<i>REDACTED</i>) <i>Regarding Personal Financial Information</i> filed by Virginia L. Giuffre.

08/22/2016	389	Motion to Compel Improper Purpose Ex. 1-9	DECLARATION of Sigrid McCawley in Opposition re: 370 MOTION for Protective Order (<i>REDACTED</i>) Regarding <i>Personal Financial Information</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED, # 5 Exhibit REDACTED, # 6 Exhibit REDACTED, # 7 Exhibit REDACTED, # 8 Exhibit REDACTED, # 9 Exhibit REDACTED)
08/23/2016	392	Motion to Compel / Improper Purpose (Motion to Strike filed at DE 400)	REPLY MEMORANDUM OF LAW in Support re: 335 MOTION for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information filed by Virginia L. Giuffre.
08/23/2016	393	Motion to Compel / Improper Purpose (Motion to Strike filed at DE 400) Ex. 1-4	DECLARATION of Sigrid McCawley in Support re: 335 MOTION for Protective Order and Motion for the Court to Direct Defendant to Disclose All Individuals to whom Defendant has Disseminated Confidential Information filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
08/24/2016	397	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: 345 MOTION to Compel Defendant to Produce Documents Subject to Improper Objection and Improper Claim of Privilege filed by Virginia L. Giuffre.
08/24/2016	398	Motion to Compel Improper Purpose - Ex. 1-5	DECLARATION of Sigrid McCawley in Support re: 345 MOTION to Compel Defendant to Produce Documents Subject to Improper Objection and Improper Claim of Privilege filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed Exhibit 1, # 2 Exhibit Sealed Exhibit 2, # 3 Exhibit Sealed Exhibit 3, # 4 Exhibit Sealed Exhibit 4, # 5 Exhibit Sealed Exhibit 5)
08/25/2016	400	Motion to Compel / Improper Purpose (Motion to Strike filed at DE 400)	MOTION for Leave to File A Sur-Reply or, Alternatively, to Strike Plaintiff's Misrepresentations of Fact to the Court filed by Ghislaine Maxwell. [DE 370]
08/25/2016	401	Motion to Compel / Improper Purpose (Motion to Strike filed at DE 400) Ex. A-F	DECLARATION of Laura A. Menninger in Support re: 400 MOTION for Leave to File A Sur-Reply or, Alternatively, to Strike Plaintiff's Misrepresentations of Fact to the Court filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F)
08/25/2016	402	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: 354 MOTION to Compel Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions. . Document filed by Ghislaine Maxwell.

08/25/2016	403	Motion to Compel Ex. C	DECLARATION of Laura A. Menninger in Support re: 354 MOTION to Compel <i>Responses to Defendant's Second Set of Discovery Requests to Plaintiff, and for Sanctions</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
08/29/2016	404	Motion to Compel	REPLY to Response to Motion re: 370 MOTION for Protective Order (<i>REDACTED</i>) <i>Regarding Personal Financial Information</i> filed by Ghislaine Maxwell.
08/29/2016	405	Motion to Compel Ex. D	DECLARATION of Laura A. Menninger in Support re: 370 MOTION for Protective Order (<i>REDACTED</i>) <i>Regarding Personal Financial Information</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit D)
08/29/2016	406	Pleadings re. Third Parties – Intervene	RESPONSE in Opposition to Motion re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> . Document filed by Virginia L. Giuffre.
08/29/2016	407	Pleadings re. Third Parties - Intervene Ex. 1-23	DECLARATION of Sigrid McCawley in Opposition re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit, # 8 Exhibit, # 9 Exhibit, # 10 Exhibit, # 11 Exhibit, # 12 Exhibit, # 13 Exhibit, # 14 Exhibit, # 15 Exhibit, # 16 Exhibit, # 17 Exhibit, # 18 Exhibit, # 19 Exhibit, # 20 Exhibit, # 21 Exhibit, # 22 Exhibit, # 23 Exhibit)
08/29/2016	408	Pleadings re. Third Parties - Intervene Ex. 1-4	DECLARATION of Paul Cassell in Opposition re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit)
09/06/2016	423	Motion to Compel Ex. A-D	DECLARATION of Laura A. Menninger in Support re: 422 MOTION to Compel <i>Settlement Agreement (Renewed)</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)
09/15/2016	435	Pleadings re. Third Parties – Intervene	DECLARATION of Alan M. Dershowitz in Support re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> . Document filed by Alan M. Dershowitz. (Attachments: # 1 Exhibit O, # 2 Exhibit P, # 3 Exhibit Q, # 4 Exhibit R, # 5 Exhibit S, # 6 Exhibit T, # 7 Exhibit U, # 8 Exhibit V, # 9 Exhibit W, # 10 Exhibit X) (Celli, Andrew)

09/15/2016	436	Pleadings re. Third Parties – Intervene	REPLY MEMORANDUM OF LAW in Support re: 362 MOTION to Intervene. MOTION to Unseal Document <i>or in the Alternative to Modify Protective Order</i> filed by Alan M. Dershowitz. (Celli, Andrew)
09/20/2016	440	Motions to Compel	NOTICE of Filing Proposed Redacted Opinion filed by Sharon Churcher. (Attachments: # 1 Exhibit Proposed Redacted Opinion) (Feder, Eric)
09/21/2016	441	Motion to Compel	MOTION for Discovery <i>for Court Approval of Plaintiff's Certification of Production</i> filed by Virginia L. Giuffre.
09/21/2016	442	Motion to Compel Ex. 2-5	DECLARATION of Sigrid McCawley in Support re: 441 MOTION for Discovery <i>for Court Approval of Plaintiff's Certification of Production</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2 Sealed, # 3 Exhibit 3 Sealed, # 4 Exhibit 4 Sealed, # 5 Exhibit 5 Sealed)
09/28/2016	447	Pleadings re. Third Parties – Intervene	LETTER RESPONSE to Motion addressed to Judge Robert W. Sweet from Sigrid S. McCawley dated September 28, 2016 re: 444 LETTER MOTION for Leave to File a less-redacted version of Professor Dershowitz's Reply Declaration addressed to Judge Robert W. Sweet from Andrew G. Celli dated 9/26/2016 filed by Virginia L. Giuffre.
09/30/2016	449	Pleadings re. Third Parties – Other	MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Ghislaine Maxwell.
09/30/2016	450	Pleadings re. Third Parties – Other Ex. A-C, E-F	DECLARATION of Jeffrey S. Pagliuca in Support re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F)
10/14/2016	466	Motion to Compel	MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> filed by Virginia L. Giuffre.
10/14/2016	467	Motion to Compel Improper Purpose Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 466 MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed Composite, # 2 Exhibit Sealed Composite, # 3 Exhibit Sealed)

10/14/2016 10/14/2016	468	Motion to Compel	MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> filed by Virginia L. Giuffre.
09/06/2016	469	Motion to Compel Improper Purpose Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 468 MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed Exhibit 1, # 2 Exhibit Sealed Composite Exhibit 2, # 3 Exhibit Sealed Exhibit 3)
10/17/2016	470	Pleadings re. Third Parties – Other	RESPONSE to Motion re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Virginia L. Giuffre.
10/17/2016	471	Pleadings re. Third Parties – Other Ex. 1	DECLARATION of Sigrid McCawley in Support re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed Composite)
10/17/2016	473	Pleadings re. Third Parties – Other	RESPONSE in Opposition to Motion re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Jeffrey Epstein. (Goldberger, Jack)
10/17/2016	474	Pleadings re. Third Parties – Other	DECLARATION of Jack Goldberger in Opposition re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> filed by Jeffrey Epstein. (Goldberger, Jack)
10/24/2016	479	Motion to Compel	RESPONSE in Opposition to Motion re: 468 MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> , filed by Ghislaine Maxwell.
10/24/2016	480	Motion to Compel Ex. A-D	DECLARATION of Laura A. Menninger in Opposition re: 468 MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)
10/24/2016	481	Motion to Compel	RESPONSE in Opposition to Motion re: 466 MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> filed by Ghislaine Maxwell.

10/24/2016	482	Motion to Compel Ex. A-E	DECLARATION of Laura A. Menninger in Opposition re: 466 MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E)
10/24/2016	483	Motion to Compel	REPLY to Response to Motion re: 449 MOTION to Compel <i>Testimony of Jeffrey Epstein</i> , filed by Ghislaine Maxwell.
10/28/2016	490	Motion to Compel	REPLY to Response to Motion re: 468 MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> . REDACTED filed by Virginia L. Giuffre.
10/28/2016	491	Motion to Compel Ex. 2-4	DECLARATION of Meredith Schultz in Support re: 468 MOTION to Compel Ghislaine Maxwell to Produce Data from Undisclosed Email Account <i>and for an Adverse Inference Instruction</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit REDACTED, # 3 Exhibit REDACTED, # 4 Exhibit REDACTED)
10/28/2016	492	Motion to Compel	REPLY to Response to Motion re: 466 MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> . REDACTED filed by Virginia L. Giuffre.
10/28/2016	493	Motion to Compel Improper Purpose Ex. 1	DECLARATION of Meredith Schultz in Support re: 466 MOTION to Reopen <i>Defendant's Deposition Based on Defendant's Late Production of New, Key Documents</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit REDACTED)
11/21/2016	503	Motion to Compel	[REDACTED] SEALED OPINION # 106882 re: 215 MOTION to Quash subpoena of Sharon Churcher, filed by Sharon Churcher. Upon the conclusions set forth above, the motion of Churcher is granted and the Subpoena is quashed. The parties are directed to jointly file a proposed redacted version of this Opinion consistent with the Protective Order or notify the Court that none are necessary within two weeks of the date of receipt of this Opinion. (9/1/16) (cla)
12/09/2016	509	Motion in Limine re. Admissibility of Evidence	MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Ghislaine Maxwell.
12/09/2016	510	Motion in Limine re. Admissibility of Evidence Ex. A-D	DECLARATION of Laura A. Menninger in Support re: 509 MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)

12/16/2016 12/16/2016	513	Motion in Limine re. Admissibility of Evidence	RESPONSE in Opposition to Motion re: 509 MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Virginia L. Giuffre.
11/21/2016	514	Motion in Limine re. Admissibility of Evidence Improper Purpose Ex. 1-6	DECLARATION of Meredith Schultz in Opposition re: 509 MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5, # 6 Exhibit Sealed Composite 6)
12/20/2016	515	Motion in Limine re. Admissibility of Evidence	REPLY to Response to Motion re: 509 MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Ghislaine Maxwell.
12/20/2016	516	Motion in Limine re. Admissibility of Evidence Ex. D-G	DECLARATION of Laura A. Menninger in Support re: 509 MOTION for Sanctions <i>Based on Plaintiff's Intentional Destruction of Evidence</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit E, # 2 Exhibit F, # 3 Exhibit G)
01/05/2017	520	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Chris Anderson</i> filed by Ghislaine Maxwell.
01/05/2017	521	Motion in Limine re. Expert Ex. A-K	DECLARATION of Jeffrey S. Pagliuca in Support re: 520 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Chris Anderson</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K)
01/05/2017	522	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinions of William F. Chandler</i> filed by Ghislaine Maxwell.
01/05/2017	523	Motion in Limine re. Expert Ex. A-B	DECLARATION of Jeffrey S. Pagliuca in Support re: 522 MOTION in Limine <i>To Exclude Expert Testimony and Opinions of William F. Chandler</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B)
01/05/2017	524	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D</i> filed by Ghislaine Maxwell.

01/05/2017	525	Motion in Limine re. Expert Ex. A-B	DECLARATION of Jeffrey S. Pagliuca in Support re: 524 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B)
01/05/2017	526	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Ghislaine Maxwell.
01/05/2017	527	Motion in Limine re. Expert Ex. A	DECLARATION of Jeffrey S. Pagliuca in Support re: 526 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
01/05/2017	528	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dr. Bernard Jansen</i> filed by Ghislaine Maxwell.
01/05/2017	529	Motion in Limine re. Expert Ex. A-G	DECLARATION of Jeffrey S. Pagliuca in Support re: 528 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dr. Bernard Jansen</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G)
01/05/2017	530	Motion in Limine re. Expert	MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Ghislaine Maxwell.
01/05/2017	531	Motion in Limine re. Expert Ex. A-C	DECLARATION of Jeffrey S. Pagliuca in Support re: 530 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
01/06/2017	533	Motion in Limine re. Expert	MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre.
01/06/2017	534	Motion in Limine re. Expert Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 533 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)

01/06/2017	535	Motion in Limine re. Expert	MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre.
01/06/2017	536	Motion in Limine re. Expert Ex. 1-5	DECLARATION of Sigrid McCawley in Support re: 535 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Redacted 1, # 2 Exhibit Redacted 2, # 3 Exhibit Redacted 3, # 4 Exhibit Redacted 4, # 5 Exhibit Redacted 5)
01/06/2017	538	Unsealed by Second Circuit	FILING ERROR - WRONG EVENT TYPE SELECTED FROM MENU – MOTION for Summary Judgment filed by Ghislaine Maxwell. Modified on 1/9/2017 (01/06/2017)
01/06/2017	539	Unsealed by Second Circuit Ex. D, G-KK, MM	FILING ERROR - DEFICIENT DOCKET ENTRY - DECLARATION of Laura A. Menninger in Support re: 538 MOTION for Summary Judgment filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G-KK, # 8 Exhibit LL, # 9 Exhibit MM)Modified on 1/9/2017
01/09/2017	541	Unsealed by Second Circuit	MEMORANDUM OF LAW in Support re: 540 MOTION for Summary Judgment. Document filed by Ghislaine Maxwell.
01/09/2017	542	Unsealed by Second Circuit Ex. D, G-KK, MM	DECLARATION of Laura A. Menninger in Support re: 540 MOTION for Summary Judgment filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G-KK, # 8 Exhibit LL, # 9 Exhibit MM)
01/23/2017	561	Objection to Deposition Designations or Counter Designations	MOTION in Limine <i>to Exclude Defendant's Designations of Deposition Excerpts of Alan Dershowitz</i> filed by Virginia L. Giuffre.
01/27/2017	562	Objection to Deposition Designations or Counter Designations Ex. 3-4	DECLARATION of Sigrid McCawley in Support re: 561 MOTION in Limine <i>to Exclude Defendant's Designations of Deposition Excerpts of Alan Dershowitz</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
01/27/2017	563	Objection to Deposition Designations or Counter Designations	MOTION in Limine <i>to Exclude Defendant's Designations of Deposition Excerpts of Virginia Giuffre in an Unrelated Case</i> filed by Virginia L. Giuffre.

01/27/2017	564	Objection to Deposition Designations or Counter Designations Ex. 1	DECLARATION of Sigrid McCawley in Support re: 563 MOTION in Limine <i>to Exclude Defendant's Designations of Deposition Excerpts of Virginia Giuffre in an Unrelated Case</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
01/27/2017	565	Objections to Deposition Designations or Counter Designations	NOTICE of Filing Plaintiff's Objections to Defendant's Deposition Designations and Plaintiff's Cross Designations filed by Virginia L. Giuffre.
01/27/2017	566	Objections to Deposition Designations or Counter Designations	Objection <i>to Plaintiff's Deposition Designations</i> filed by Ghislaine Maxwell.
01/27/2017	567	Objections to Deposition Designations or Counter Designations	MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Ghislaine Maxwell.
01/27/2017	568	Objections to Deposition Designations or Counter Designations Ex. A-E	DECLARATION of Laura A. Menninger in Support re: 567 MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E)
01/30/2017	569	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 530 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Virginia L. Giuffre.
01/30/2017	570	Motion in Limine re. Expert Ex. 1-5	DECLARATION of Sigrid McCawley in Opposition re: 530 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5)
01/30/2017	572	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 524 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.</i> filed by Virginia L. Giuffre.
01/30/2017	573	Motion in Limine re. Expert Ex. 1-5	DECLARATION of Sigrid McCawley in Opposition re: 524 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5)

01/30/2017	574	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 522 MOTION in Limine <i>To Exclude Expert Testimony and Opinions of William F. Chandler</i> filed by Virginia L. Giuffre.
01/30/2017	575	Motion in Limine re. Expert Ex. 1-3	DECLARATION of Sigrid McCawley in Opposition re: 522 MOTION in Limine <i>To Exclude Expert Testimony and Opinions of William F. Chandler</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)
01/30/2017	576	Motion in Limine re. Evidence	NOTICE of Letter Reply in Support of Plaintiff's Letter Motion to Add New Witness re: 558 Order Setting Hearing on Motion, filed by Virginia L. Giuffre.
01/31/2017	577	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 526 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Virginia L. Giuffre.
01/31/2017	578	Motion in Limine re. Expert Ex. 1-5	DECLARATION of Sigrid McCawley in Opposition re: 526 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5)
01/31/2017	579	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 520 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Chris Anderson</i> filed by Virginia L. Giuffre.
01/31/2017	580	Motion in Limine re. Expert Ex. 1-4	DECLARATION of Sigrid McCawley in Opposition re: 520 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Chris Anderson</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
01/31/2017	581	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 528 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dr. Bernard Jansen</i> filed by Virginia L. Giuffre.
01/31/2017	582	Motion in Limine re. Expert Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: 528 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dr. Bernard Jansen</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)

01/31/2017	583	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 535 MOTION in Limine <i>and Incorporated Memorandum of Law. Regarding Gregory B. Taylor and Kyle D. Jacobson</i> filed by Ghislaine Maxwell.
01/31/2017	584	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 533 MOTION in Limine <i>and Incorporated Memorandum of Law. Regarding Dr. Phillip Esplin</i> filed by Ghislaine Maxwell.
01/31/2017	585	Motion in Limine re. Expert Ex. A	DECLARATION of Jeffrey S. Pagliuca in Opposition re: 533 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
01/31/2017	586	Unsealed by Second Circuit	RESPONSE in Opposition to Motion re: 540 MOTION for Summary Judgment filed by Virginia L. Giuffre. (Attachments: # 1 Appendix Rule 56.1 Statement of Facts, # 2 Exhibit Declaration, # 3 Exhibit Redacted 1-50)
02/03/2017	591	Pleadings re. Third Parties – Other	LETTER MOTION to Reopen re: 576 Notice (Other), 558 Order Setting Hearing on Motion, <i>Discovery re New Witness (original filed 1/19/17)</i> addressed to Judge Robert W. Sweet from Sigrid S. McCawley dated 01/19/17 filed by Virginia L. Giuffre.
02/03/2017	592	Deposition Designations or Counter Designations	NOTICE of Filing Defendant's Counter-Designations to Plaintiff's Deposition Designations filed by Ghislaine Maxwell.
02/09/2017	599	Motion in Limine re. Expert	REPLY MEMORANDUM OF LAW in Support re: 535 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre.
02/09/2017	600	Motion in Limine re. Expert	DECLARATION of Sigrid McCawley in Support re: 535 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2, # 3 Exhibit Sealed 3)
02/09/2017	601	Motion in Limine re. Evidence	NOTICE of Intent to Offer Statements Under, If Necessary, The Residual Hearsay Rule filed by Virginia L. Giuffre.

02/09/2017	602	Motion in Limine re. Expert	REPLY MEMORANDUM OF LAW in Support re: 533 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre.
02/09/2017	603	Motion in Limine re. Expert	DECLARATION of Sigrid McCawley in Support re: 533 MOTION in Limine <i>and Incorporated Memorandum of Law</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2, # 3 Exhibit Sealed 3)
02/10/2017	606	Objections to Deposition Designations or Counter Designations	RESPONSE in Opposition to Motion re: 567 MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Virginia L. Giuffre.
02/10/2017	607	Objections to Deposition Designations or Counter Designations Ex. 1-3	DECLARATION of Sigrid McCawley in Opposition re: 567 MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)
02/10/2017	608	Motion in Limine re. Evidence	MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Virginia L. Giuffre.
02/10/2017	609	Motion in Limine re. Evidence Ex. 1	DECLARATION of Sigrid McCawley in Support re: 608 MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
02/10/2017	611	Motion in Limine re. Expert	REPLY to Response to Motion re: 520 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Chris Anderson</i> filed by Ghislaine Maxwell.
02/10/2017	612	Motion in Limine re. Expert	REPLY to Response to Motion re: 522 MOTION in Limine <i>To Exclude Expert Testimony and Opinions of William F. Chandler</i> filed by Ghislaine Maxwell.
02/10/2017	613	Motion in Limine re. Expert	REPLY to Response to Motion re: 528 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dr. Bernard Jansen</i> filed by Ghislaine Maxwell.

02/10/2017	614	Motion in Limine re. Expert	REPLY to Response to Motion re: 524 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D</i> filed by Ghislaine Maxwell.
02/10/2017	615	Motion in Limine re. Expert Ex. C-E	DECLARATION of Jeffrey S. Pagliuca in Support re: 524 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Professor Terry Coonan, J.D.</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit C, # 2 Exhibit D, # 3 Exhibit E)
02/10/2017	616	Motion in Limine re. Expert	REPLY to Response to Motion re: 526 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Ghislaine Maxwell.
02/10/2017	617	Motion in Limine re. Expert Ex. B	DECLARATION of Jeffrey S. Pagliuca in Support re: 526 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Dianne C. Flores</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit B)
02/10/2017	618	Motion in Limine re. Expert	REPLY to Response to Motion re: 530 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Ghislaine Maxwell.
02/10/2017	619	Motion in Limine re. Expert Ex. D-E	DECLARATION of Jeffrey S. Pagliuca in Support re: 530 MOTION in Limine <i>To Exclude Expert Testimony and Opinion of Doctor Gilbert Kliman</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit D, # 2 Exhibit E)
02/10/2017	620	Unsealed by Second Circuit	REPLY to Response to Motion re: 540 MOTION for Summary Judgment filed by Ghislaine Maxwell. (Attachments: # 1 Appendix Rule 56.1 Statement of Facts)
02/10/2017	621	Unsealed by Second Circuit Ex. OO-N	DECLARATION of Laura A. Menninger in Support re: 540 MOTION for Summary Judgment filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit NN, # 2 Exhibit OO, # 3 Exhibit PP, # 4 Exhibit QQ, # 5 Exhibit RR)
02/10/2017	622	Case Management	JOINT PRETRIAL STATEMENT filed by Ghislaine Maxwell.

02/17/2017	630	Objections to Deposition Designations or Counter Designations	NOTICE of Plaintiff's Objections to Defendant's Counter Designations filed by Virginia L. Giuffre.
02/17/2017	631	Objections to Deposition Designations or Counter Designations	REPLY to Response to Motion re: 567 MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Ghislaine Maxwell.
02/17/2017	632	Objections to Deposition Designations or Counter Designations Ex. F	DECLARATION of Laura A. Menninger in Support re: 567 MOTION in Limine <i>to Exclude In Toto Certain Depositions Designated By Plaintiff for Use at Trial</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit F)
02/17/2017	633	Objections to Deposition Designations or Counter Designations	Objection <i>to Plaintiff's Cross Designation of Deposition Testimony</i> filed by Ghislaine Maxwell.
02/17/2017	637	Motion to Compel	MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications filed by Virginia L. Giuffre.
02/22/2017	638	Motion to Compel Ex. 2-5	DECLARATION of Meredith Schultz in Support re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications. Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Exhibit 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5)
02/22/2017	640	Pleadings re. Third Party-Other	MOTION for Protective Order <i>for Non-Party Witness</i> filed by John Stanley Pottinger, Sarah Ransome.
02/22/2017	641	Pleadings re. Third Party-Other Ex. 1-2	DECLARATION of John Stanley Pottinger in Support re: 640 MOTION for Protective Order <i>for Non-Party Witness</i> filed by Sarah Ransome. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
02/24/2017	644	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 608 MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Ghislaine Maxwell.

02/24/2017	645	Motion in Limine re. Evidence Ex. A-D	DECLARATION of Laura A. Menninger in Opposition re: 608 MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D)
02/24/2017	646	Motion in Limine re. Evidence	RESPONSE re: 601 Notice (Other) <i>Response to Plaintiffs Notice Of Intent To Offer Statements Under, If Necessary, The Residual Hearsay Rule</i> filed by Ghislaine Maxwell.
03/02/2017	650	Motion in Limine re. Evidence	REPLY MEMORANDUM OF LAW in Support re: 608 MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Virginia L. Giuffre.
03/02/2017	651	Motion in Limine re. Evidence Ex.1-2	DECLARATION of Sigrid McCawley in Support re: 608 MOTION in Limine <i>to Present Testimony From Jeffrey Epstein for Purposes of Obtaining an Adverse Inference</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/02/2017	653	Pleadings re. Third Parties - Other	RESPONSE in Opposition to Motion re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications filed by Ghislaine Maxwell.
03/02/2017	654	Pleadings re. Third Parties - Other Ex. A	DECLARATION of Laura A. Menninger in Opposition re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
03/02/2017	655	Pleadings re. Third Party-Other	MOTION to Compel <i>Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order</i> filed by Ghislaine Maxwell.
03/02/2017	656	Pleadings re. Third Party-Other	DECLARATION of Laura A. Menninger in Support re: 655 MOTION to Compel <i>Non- Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I)
03/03/2017	657	Pleadings re. Third Party-Other	MOTION to Quash filed by Jeffrey Epstein. Epstein Motion to Quash Trial Subpoena

03/03/2017	659	Motion to Compel	SECOND MOTION to Compel Ghislaine Maxwell to Disclose Data from Defendant's Undisclosed Email Account and for An Adverse Inference Instruction filed by Virginia L. Giuffre.
03/03/2017	660	Motion to Compel Ex. 1-4	DECLARATION of Meredith Schultz in Support re: 659 SECOND MOTION to Compel Ghislaine Maxwell to Disclose Data from Defendant's Undisclosed Email Account and for An Adverse Inference Instruction filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Exhibit 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
03/03/2017	662	Case Management	MOTION to Bifurcate <i>Trial Relating to Punitive Damages and Exclusion of any Reference to Defendants Financial Information in the Liability Phase</i> filed by Ghislaine Maxwell.
03/03/2017	663	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Complaint and Settlement Agreement in Jane Doe 102 v. Jeffrey Epstein</i> filed by Ghislaine Maxwell.
03/03/2017	664	Motion in Limine re. Expert	MOTION in Limine <i>to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman</i> filed by Ghislaine Maxwell.
03/03/2017	665	Motion in Limine re. Evidence	MOTION in Limine <i>to Prohibit Questioning Regarding Defendants Adult Consensual Sexual Activities</i> filed by Ghislaine Maxwell.
03/03/2017	666	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Evidence Barred as a Result of Plaintiffs Summary Judgment Concessions</i> filed by Ghislaine Maxwell.
03/03/2017	667	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude FBI 302 Statement of Plaintiff</i> filed by Ghislaine Maxwell.
03/03/2017 03/03/2017	668	Motion in Limine re. Evidence Ex. A	DECLARATION of Laura A. Menninger in Support re: 667 MOTION in Limine <i>to Exclude FBI 302 Statement of Plaintiff</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)

03/03/2017	669	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude References to Crime Victims Rights Act Litigation</i> filed by Ghislaine Maxwell.
03/03/2017	670	Motion in Limine re. Evidence Ex. A	DECLARATION of Laura A. Menninger in Support re: 669 MOTION in Limine <i>to Exclude References to Crime Victims Rights Act Litigation</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
03/03/2017	671	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Ghislaine Maxwell.
03/03/2017	672	Motion in Limine re. Evidence Ex. A-B	DECLARATION of Laura A. Menninger in Support re: 671 MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B)
03/03/2017	673	Motion in Limine re. Evidence	MOTION in Limine <i>Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege</i> filed by Ghislaine Maxwell.
03/03/2017	674	Motion in Limine re. Evidence Ex. A	DECLARATION of Laura A. Menninger in Support re: 673 MOTION in Limine <i>Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
03/03/2017	675	Motion in Limine re. Evidence	MOTION in Limine <i>to Permit Questioning Regarding Plaintiffs Sexual History and Reputation</i> filed by Ghislaine Maxwell.
03/03/2017	676	Motion in Limine re. Evidence Ex. A-F	DECLARATION of Laura A. Menninger in Support re: 675 MOTION in Limine <i>to Permit Questioning Regarding Plaintiffs Sexual History and Reputation</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F)
03/03/2017	677	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Ghislaine Maxwell.

03/03/2017	678	Motion in Limine re. Evidence Ex. A-C	DECLARATION of Jeffrey S. Pagliuca in Support re: 677 MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
03/03/2017	679	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Unauthenticated Hearsay Document from a Suspect Source</i> filed by Ghislaine Maxwell.
03/03/2017	680	Motion in Limine re. Evidence Ex. A-C	DECLARATION of Jeffrey S. Pagliuca in Support re: 679 MOTION in Limine <i>to Exclude Unauthenticated Hearsay Document from a Suspect Source</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
03/03/2017	681	Motion in Limine re. Evidence	MOTION in Limine <i>to Exclude Victim Notification Letter</i> filed by Ghislaine Maxwell.
03/03/2017	682	Motion in Limine re. Evidence Ex. A-C	DECLARATION of Laura A. Menninger in Support re: 681 MOTION in Limine <i>to Exclude Victim Notification Letter</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C)
03/03/2017	683	Motion in Limine re. Evidence	MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL</i> filed by Virginia L. Giuffre.
03/03/2017	684	Motion in Limine re. Evidence Ex. 1-2	DECLARATION of Sigrid S. McCawley in Support re: 683 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 (Filed Under Seal), # 2 Exhibit 2 (Filed Under Seal))
03/03/2017	685	Motion in Limine re. Evidence	MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO PRECLUDE DEFENDANT FROM CALLING PLAINTIFFS ATTORNEYS AS WITNESSES AT TRIAL</i> filed by Virginia L. Giuffre.
03/03/2017	686	Motion in Limine re. Evidence	MOTION in Limine <i>PLAINTIFF MS. GIUFFRE'S MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING</i> filed by Virginia L. Giuffre.

03/03/2017	687	Motion in Limine re. Evidence Ex. 1	DECLARATION of Sigrid S. McCawley in Support re: 686 MOTION in Limine <i>PLAINTIFF MS. GIUFFRES MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 (Filed Under Seal))
03/03/2017	689	Motion in Limine re. Evidence	MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction</i> filed by Virginia L. Giuffre.
03/03/2017	690	Motion in Limine re. Evidence Ex. 1	DECLARATION of Sigrid McCawley in Support re: 689 MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Exhibit 1)
03/03/2017	691	Motion in Limine re. Evidence	MOTION in Limine <i>Omnibus</i> filed by Virginia L. Giuffre.
03/03/2017	692	Motion in Limine re. Evidence Ex. 1-6	DECLARATION of Sigrid McCawley in Support re: 691 MOTION in Limine <i>Omnibus</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5, # 6 Exhibit Sealed 6)
03/03/2017	693	Motion in Limine re. Evidence	MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Ghislaine Maxwell.
03/03/2017	694	Motion in Limine re. Evidence Ex. A-I	DECLARATION of Laura A. Menninger in Support re: 693 MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I)
03/07/2017	697	Motion to Compel	REPLY MEMORANDUM OF LAW in Support re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications. .Document filed by Virginia L. Giuffre.
03/07/2017	698	Motion to Compel Ex. 1-2	DECLARATION of Meredith Schultz in Support re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2)

03/07/2017	700	Pleadings re. Third Parties - Other	*** STRICKEN DOCUMENT. Deleted document number 700 from the case record. The document was stricken from this case pursuant to 718 Order on Motion to Seal Document. REPLY MEMORANDUM OF LAW in Support re: 640 MOTION for Protective Order <i>for Non-Party Witness and Opposition to [DE 655] MOTION to Compel Non-Party Witness to Produce Documents, and Respond to Deposition Questions</i> filed by John Stanley Pottinger. Modified on 3/15/2017.
03/07/2017	701	Pleadings re. Third Parties - Other Ex. 1-2	DECLARATION of J. Stanley Pottinger in Support re: 640 MOTION for Protective Order <i>for Non-Party Witness</i> filed by John Stanley Pottinger. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/10/2017	705	Motion in Limine re. Evidence	NOTICE of Reply Notice of Intent to Offer Statements Under, If Necessary, the Residual Hearsay Rule re: 601 Notice (Other) filed by Virginia L. Giuffre.
03/10/2017	706	Motion in Limine re. Evidence Ex. 1-2	NOTICE of Sigrid McCawley Declaration in Support of Reply Notice of Intent to Offer Statements Under, If Necessary, the Residual Hearsay Rule re: 705 Notice (Other). Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/13/2017	707	Pleadings re. Third Party-Other	REPLY MEMORANDUM OF LAW in Support re: 640 MOTION for Protective Order <i>for Non-Party Witness</i> , 655 MOTION to Compel <i>Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order. [RE-FILED W/ ADD'L REDACTION/REPLACE DE 700]</i> filed by Virginia L. Giuffre.
03/13/2017	709	Pleadings re. Third Party-Other	REPLY MEMORANDUM OF LAW in Support re: 640 MOTION for Protective Order <i>for Non-Party Witness</i> , 655 MOTION to Compel <i>Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order. [RE-FILED W/ ADD'L REDACTION/REPLACE DE 700]</i> filed by John Stanley Pottinger.
03/14/2017	712	Pleadings re. Third Party-Other	RESPONSE in Opposition to Motion re: 657 MOTION to Quash. Document filed by Virginia L. Giuffre. PTF Response to Jeffrey Epstein Motion to Quash Trial Subpoena
03/14/2017	713	Pleadings re. Third Party-Other Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: 657 MOTION to Quash filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)

03/14/2017	714	Pleadings re. Third Party-Other	REPLY to Response to Motion re: 655 MOTION to Compel <i>Non-Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order</i> filed by Ghislaine Maxwell.
03/14/2017	5712	Pleadings re. Third Party-Other Ex. J-K	DECLARATION of Laura A. Menninger in Support re: 655 MOTION to Compel <i>Non- Party Witness to Produce Documents, Respond to Deposition Questions, and Response to Motion for Protective Order</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit J, # 2 Exhibit K)
03/15/2017	716	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 679 MOTION in <i>Limine to Exclude Unauthenticated Hearsay Document from a Suspect Source</i> filed by Virginia L. Giuffre.
03/15/2017	717	Motion in Limine re. Evidence Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: 679 MOTION in <i>Limine to Exclude Unauthenticated Hearsay Document from a Suspect Source</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/15/2017	721	Case Management	NOTICE of Notice of Intent to Redact Transcript of Proceedings re: 702 Transcript, filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Transcript (Filed Under Seal))
03/17/2017	722	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 673 MOTION in <i>Limine Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege</i> filed by Virginia L. Giuffre.
03/17/2017	723	Motion in Limine re. Evidence Ex. 1	DECLARATION of Sigrid McCawley in Opposition re: 673 MOTION in <i>Limine Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
03/17/2017	724	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 663 MOTION in <i>Limine to Exclude Complaint and Settlement Agreement in Jane Doe 102 v. Jeffrey Epstein</i> filed by Virginia L. Giuffre.
03/17/2017	726	Motion in Limine re. Expert	RESPONSE in Opposition to Motion re: 664 MOTION in <i>Limine to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman</i> filed by Virginia L. Giuffre.

03/17/2017	727	Motion in Limine re. Expert Ex. 1-4	DECLARATION of Sigrid McCawley in Opposition re: 664 MOTION in Limine <i>to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
03/17/2017	728	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 669 MOTION in Limine <i>to Exclude References to Crime Victims Rights Act Litigation</i> filed by Virginia L. Giuffre.
03/17/2017	729	Motion in Limine re. Evidence Ex. 1-6	DECLARATION of Bradley Edwards in Opposition re: 669 MOTION in Limine <i>to Exclude References to Crime Victims Rights Act Litigation</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit, # 2 Exhibit, # 3 Exhibit, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit)
03/17/2017	730	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 667 MOTION in Limine <i>to Exclude FBI 302 Statement of Plaintiff</i> filed by Virginia L. Giuffre.
03/17/2017	731	Motion in Limine re. Evidence Ex. 1	DECLARATION of Bradley Edwards in Opposition re: 667 MOTION in Limine <i>to Exclude FBI 302 Statement of Plaintiff</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit)
03/17/2017	732	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 681 MOTION in Limine <i>to Exclude Victim Notification Letter</i> filed by Virginia L. Giuffre.
03/17/2017	733	Motion in Limine re. Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Opposition re: 681 MOTION in Limine <i>to Exclude Victim Notification Letter</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)
03/17/2017 03/17/2017	735	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 693 MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Virginia L. Giuffre.
03/17/2017	736	Motion in Limine re. Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Opposition re: 693 MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)

03/17/2017	738	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 675 MOTION in Limine <i>to Permit Questioning Regarding Plaintiffs Sexual History and Reputation</i> filed by Virginia L. Giuffre.
03/17/2017	739	Motion in Limine re. Evidence Ex. 1-4	DECLARATION of Meredith Schultz in Opposition re: 675 MOTION in Limine <i>to Permit Questioning Regarding Plaintiffs Sexual History and Reputation</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4)
03/17/2017	740	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 671 MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Virginia L. Giuffre.
03/17/2017	741	Motion in Limine re. Evidence Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: 671 MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/17/2017	742	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 683 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL.</i> . Document filed by Ghislaine Maxwell.
03/17/2017	743	Motion in Limine re. Evidence Ex. A-F	DECLARATION of Jeffrey S. Pagliuca in Opposition re: 683 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F)
03/17/2017	744	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 686 MOTION in Limine <i>PLAINTIFF MS. GIUFFRES MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING</i> filed by Ghislaine Maxwell.
03/17/2017	745	Motion in Limine re. Evidence Ex. A, C-E	DECLARATION of Laura A. Menninger in Opposition re: 686 MOTION in Limine <i>PLAINTIFF MS. GIUFFRES MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING.</i> .. Document filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E)

03/17/2017	746	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 689 MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction</i> filed by Ghislaine Maxwell.
03/17/2017	747	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 677 MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Virginia L. Giuffre.
03/17/2017	748	Motion in Limine re. Evidence Ex. A-D	DECLARATION of Laura A. Menninger in Opposition re: 689 MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E)
03/17/2017	749	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 691 MOTION in Limine <i>Omnibus</i> filed by Ghislaine Maxwell.
03/17/2017	750	Motion in Limine re. Evidence Ex. 1-9	DECLARATION of Meredith Schultz in Opposition re: 677 MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Composite Sealed 4, # 5 Exhibit Sealed 5, # 6 Exhibit Sealed 6, # 7 Exhibit Sealed 7, # 8 Exhibit Composite Sealed 8, # 9 Exhibit Sealed 9)
03/17/2017	751	Motion in Limine re. Evidence Ex. C-F, H, M-Q	DECLARATION of Laura A. Menninger in Opposition re: 691 MOTION in Limine <i>Omnibus</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J, # 11 Exhibit K, # 12 Exhibit L, # 13 Exhibit M, # 14 Exhibit N, # 15 Exhibit O, # 16 Exhibit P, # 17 Exhibit Q, # 18 Exhibit R, # 19 Exhibit S)
03/17/2017	754	Motion to Compel	REPLY MEMORANDUM OF LAW in Opposition re: 637 MOTION to Compel Philip Barden To Produce All Work Product and Attorney Client Communications. <i>Defendant's Surreply</i> filed by Ghislaine Maxwell.
03/21/2017	761	Pleadings re. Third Party-Other	REPLY to Response to Motion re: 657 MOTION to Quash filed by Jeffrey Epstein. Jeffrey Epstein Reply ISO Motion to Quash Trial Subpoena

03/21/2017	764	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 666 MOTION in Limine <i>to Exclude Evidence Barred as a Result of Plaintiffs Summary Judgment Concessions</i> filed by Virginia L. Giuffre.
03/22/2017	766	Case Management	RESPONSE in Opposition to Motion re: 662 MOTION to Bifurcate Trial <i>Relating to Punitive Damages and Exclusion of any Reference to Defendants Financial Information in the Liability Phase</i> filed by Virginia L. Giuffre.
03/22/2017	768	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 665 MOTION in Limine <i>to Prohibit Questioning Regarding Defendants Adult Consensual Sexual Activities</i> filed by Virginia L. Giuffre.
03/22/2017	769	Motion in Limine re. Evidence Ex. 1-2	DECLARATION of Sigrid McCawley in Opposition re: 665 MOTION in Limine <i>to Prohibit Questioning Regarding Defendants Adult Consensual Sexual Activities</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2)
03/23/2017	770	Motion in Limine re. Evidence	REPLY to Response to Motion re: 689 MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction. [Re Kellen/Marcinkova]</i> . Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Comp 1 (Sealed), # 2 Exhibit 2 (Sealed))
03/23/2017	771	Motion in Limine re. Evidence	DECLARATION of Sigrid S. McCawley in Support re: 689 MOTION in Limine <i>to Present Testimony for Purpose of Obtaining an Adverse Inference Instruction</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite 1 (Sealed), # 2 Exhibit 2 (Sealed))
03/23/2017	772	Motion in Limine re. Evidence	RESPONSE in Opposition to Motion re: 685 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO PRECLUDE DEFENDANT FROM CALLING PLAINTIFFS ATTORNEYS AS WITNESSES AT TRIAL</i> filed by Ghislaine Maxwell.
03/23/2017	773	Motion in Limine re. Evidence Ex. A, F, H-J	DECLARATION of Jeffrey S. Pagliuca in Opposition re: 685 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO PRECLUDE DEFENDANT FROM CALLING PLAINTIFFS ATTORNEYS AS WITNESSES AT TRIAL</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G, # 8 Exhibit H, # 9 Exhibit I, # 10 Exhibit J)
03/24/2017	774	Motion in Limine re. Evidence	REPLY MEMORANDUM OF LAW in Support re: 683 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL</i> filed by Virginia L. Giuffre.

03/24/2017	775	Motion in Limine re. Evidence Ex. 1	DECLARATION of Sigrid McCawley in Support re: 683 MOTION in Limine <i>PLAINTIFFS MOTION IN LIMINE TO ADMIT THE BLACK BOOK AS EVIDENCE AT TRIAL</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Sealed 1) ENDORSED LETTER addressed to Judge Robert W. Sweet from Jeffrey S. Pagliuca dated 3/22/17 re: Ms. Maxwell respectfully requests that she be permitted to submit her reply by March 31, 2017. ENDORSEMENT: Extension to 3/30 is granted. So ordered. (Replies due by 3/30/2017.)
03/24/2017	781	Motion in Limine re. Evidence	REPLY MEMORANDUM OF LAW in Support re: 686 MOTION in Limine <i>PLAINTIFF MS. GIUFFRES MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING</i> filed by Virginia L. Giuffre.
03/24/2017	782	Motion in Limine re. Evidence Ex. 1-4	DECLARATION of Sigrid McCawley in Support re: 686 MOTION in Limine <i>PLAINTIFF MS. GIUFFRES MEMORANDUM OF LAW IN SUPPORT OF HER MOTION IN LIMINE TO PRESENT ALL EVIDENCE OF DEFENDANTS INVOLVEMENT IN EPSTEIN SEXUAL ABUSE AND SEX TRAFFICKING..</i> Document filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4) (03/24/2017)
03/24/2017	783	Motion in Limine re. Evidence	REPLY to Response to Motion re: 667 MOTION in Limine <i>to Exclude FBI 302 Statement of Plaintiff</i> filed by Ghislaine Maxwell.
03/24/2017	784	Motion in Limine re. Evidence	REPLY to Response to Motion re: 669 MOTION in Limine <i>to Exclude References to Crime Victims Rights Act Litigation</i> filed by Ghislaine Maxwell. (Attachments: # 1 Appendix A, # 2 Appendix B)
03/24/2017	786	Motion in Limine re. Expert	REPLY to Response to Motion re: 664 MOTION in Limine <i>to Exclude Late Disclosed Supplemental Report of Dr. James Jansen and Video Trial Exhibit of Dr. Gilbert Kliman</i> filed by Ghislaine Maxwell.
03/24/2017	788	Motion in Limine re. Evidence	REPLY to Response to Motion re: 671 MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Ghislaine Maxwell.
03/24/2017	789	Motion in Limine re. Evidence Ex. C	DECLARATION of Laura A. Menninger in Support re: 671 MOTION in Limine <i>to Exclude Jeffrey Epstein Plea and Non-Prosecution Agreement and Sex Offender Registration</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit C, # 2 Exhibit D)

03/24/2017	790	Motion in Limine re. Evidence	REPLY to Response to Motion re: 675 MOTION in Limine <i>to Permit Questioning Regarding Plaintiffs Sexual History and Reputation</i> filed by Ghislaine Maxwell.
03/24/2017	791	Motion in Limine re. Evidence	REPLY to Response to Motion re: 681 MOTION in Limine <i>to Exclude Victim Notification Letter</i> filed by Ghislaine Maxwell.
03/27/2017	796	Case Management Ex. 1	NOTICE of Notice of Intent to Redact 03/09/17 Transcript of Proceedings [DE 756] re: 756 Notice of Filing Transcript, filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 (Filed Under Seal))
03/27/2017	798	Motion in Limine re. Evidence	REPLY MEMORANDUM OF LAW in Support re: 691 MOTION in Limine <i>Omnibus</i> filed by Virginia L. Giuffre.
03/27/2017	799	Motion in Limine re. Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 691 MOTION in Limine <i>Omnibus</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Composite Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3)
03/28/2017	802	Objections to Deposition Designations or Counter Designations	NOTICE of Filing Plaintiff's Responses to Defendant's Objections to Plaintiff's Deposition Designations filed by Virginia L. Giuffre.
03/28/2017	803	Deposition Designations of Counter Designations	NOTICE of Filing Typographical Errors Relating to Plaintiff's Deposition Designations for Use at Trial filed by Virginia L. Giuffre.
03/28/2017	806	Motion to Compel	Objection <i>to Production of (Blank) Submitted for in Camera Review</i> filed by Ghislaine Maxwell. (Defendant Objection to Production of Common Interest Agreement Submitted for In Camera Review)
03/28/2017	807	Motion in Limine re. Evidence	REPLY to Response to Motion re: 666 MOTION in Limine <i>to Exclude Evidence Barred as a Result of Plaintiffs Summary Judgment Concessions</i> filed by Ghislaine Maxwell.

03/29/2017	812	Motion in Limine re. Evidence	REPLY to Response to Motion re: 665 MOTION in Limine <i>to Prohibit Questioning Regarding Defendants Adult Consensual Sexual Activities</i> filed by Ghislaine Maxwell.
03/29/2017	813	Unsealed by Second Circuit Ex. 1	NOTICE of Plaintiff's Proposed Redactions to This Court's Order Denying Summary Judgment filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
03/30/2017	815	Motion in Limine re. Evidence	REPLY to Response to Motion re: 677 MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Ghislaine Maxwell.
03/30/2017	816	Motion in Limine re. Evidence Ex. D-G	DECLARATION of Jeffrey S. Pagliuca in Support re: 677 MOTION in Limine <i>to Exclude Police Reports and Other Inadmissible Hearsay</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit D, # 2 Exhibit E, # 3 Exhibit F, # 4 Exhibit G)
03/30/2017	817	Motion in Limine re. Evidence	REPLY to Response to Motion re: 673 MOTION in Limine <i>Exclude Deposition Testimony of Sarah Kellen and Nadia Marcinkova or Any Witness Invoking Their Fifth Amendment Privilege</i> filed by Ghislaine Maxwell.
03/30/2017	818	Motion in Limine re. Evidence	REPLY to Response to Motion re: 663 MOTION in Limine <i>to Exclude Complaint and Settlement Agreement in Jane Doe 102 v. Jeffrey Epstein</i> filed by Ghislaine Maxwell.
03/30/2017	819	Motion in Limine re. Evidence Ex. A-B	DECLARATION of Laura A. Menninger in Support re: 663 MOTION in Limine <i>to Exclude Complaint and Settlement Agreement in Jane Doe 102 v. Jeffrey Epstein</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B)
03/30/2017	820	Motion in Limine re. Evidence	REPLY to Response to Motion re: 693 MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Ghislaine Maxwell.
03/30/2017	821	Motion in Limine re. Evidence Ex. K-L	DECLARATION of Laura A. Menninger in Support re: 693 MOTION <i>to Exclude Evidence Pursuant to Fed. R. Evid. 404(b)</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit J, # 2 Exhibit K, # 3 Exhibit L)

03/30/2017	822	Case Management	REPLY to Response to Motion re: 662 MOTION to Bifurcate Trial Relating to Punitive Damages and Exclusion of any Reference to Defendants Financial Information in the Liability Phase filed by Ghislaine Maxwell.
03/30/2017	823	Case Management	NOTICE of Intent to Request Redaction of Sealed Opinion filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
04/03/2017	826	Objections to Deposition Designations or Counter Designations	Objection to Plaintiff's Deposition Designations (AMENDED) filed by Ghislaine Maxwell.
04/03/2017	827	Motion in Limine re. Evidence	REPLY MEMORANDUM OF LAW in Support re: 685 MOTION in Limine PLAINTIFFS MOTION IN LIMINE TO PRECLUDE DEFENDANT FROM CALLING PLAINTIFFS ATTORNEYS AS WITNESSES AT TRIAL filed by Virginia L. Giuffre.
04/03/2017	828	Motion in Limine re. Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 685 MOTION in Limine PLAINTIFFS MOTION IN LIMINE TO PRECLUDE DEFENDANT FROM CALLING PLAINTIFFS ATTORNEYS AS WITNESSES AT TRIAL filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed Exhibit 1, # 2 Exhibit Sealed Exhibit 2, # 3 Exhibit Sealed Exhibit 3)
04/04/2017	830	Motion to Compel	OPPOSITION BRIEF re: 806 Objection (non-motion) and Second Motion to Compel Defendant to Produce Documents filed by Virginia L. Giuffre. (Plaintiff Response to Defendant's Objection to Production of Common Interest Agreement Submitted for In Camera Review and Second Motion to Compel DEF to Produce her Joint Defense Agreements with Jeffrey Epstein)
04/07/2017 04/07/2017	838	Motion to Compel	NOTICE of Plaintiff's Briefing on an Adverse Inference Instruction Regarding Defendant's Failure to Comply with This Court's Order to Produce Her Electronic Documents and Communications filed by Virginia L. Giuffre.
04/06/2017	839	Motion to Compel Ex. 1-6	NOTICE of Declaration in Support of Plaintiff's Briefing on an Adverse Inference Instruction Regarding Defendant's Failure to Comply with This Courts Orders to Produce Her Electronic Documents and Communications re: 838 Notice (Other), filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5, # 6 Exhibit Sealed Composite 6)

04/10/2017	840	Case Management	NOTICE of Intent to Request Redactions to the March 16, 2017 Transcript filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
04/11/2017	841	Motion to Compel	REPLY re: 806 Objection (non-motion) <i>to Production of (Blank) Submitted for in Camera Review</i> filed by Ghislaine Maxwell. (Defendant's Reply ISO Objection to Production of Common Interest Agreement Submitted for In Camera Review)
04/11/2017	842	Motion to Compel Ex. A	DECLARATION of Jeffrey S. Pagliuca in Support re: 806 Objection (non-motion) filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
04/11/2017	843	Motion to Compel	NOTICE of Plaintiff's Proposed Redactions to This Court's April 4, 2017 Order Denying Defendant's Motion to Compel and Motion for Sanctions filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
04/11/2017	844	Motion to Compel Ex. A-B	MOTION for Reconsideration re: 837 Order on Motion for Miscellaneous Relief, <i>Defendant's Motion Requesting Ruling on Her Outstanding Motions</i> filed by Ghislaine Maxwell. (Attachments: # 1 Appendix A, # 2 Appendix B)
04/11/2017	845	Case Management	MOTION to Appoint Special Master <i>to Preside Over Third Deposition of Defendant</i> filed by Ghislaine Maxwell.
04/11/2017	846	Case Management Ex. A	DECLARATION of Laura A. Menninger in Support re: 845 MOTION to Appoint Special Master <i>to Preside Over Third Deposition of Defendant</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A)
04/18/2017	856	Case Management	RESPONSE in Opposition to Motion re: 845 MOTION to Appoint Special Master <i>to Preside Over Third Deposition of Defendant</i> filed by Virginia L. Giuffre.
04/18/2017	859	Case Management	JOINT PRETRIAL STATEMENT filed by Virginia L. Giuffre.

04/18/2017	860	Case Management	NOTICE of Plaintiff's Proposed Redactions to This Court's April 4, 2017 Order Denying Bradley Edwards Motion to Quash filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
4/20/2017	864	Motion to Compel	FILING ERROR - DEFICIENT DOCKET ENTRY - MOTION to Compel Non-Party Witness to Produce <i>Documents and Respond to Deposition Questions and to Complete Search of ESI</i> filed by Ghislaine Maxwell. (Attachments: # 1 Declaration of Laura Menninger, # 2 Exhibits A-F)
04/26/2017	871	Motion to Compel	RESPONSE in Opposition to Motion re: 864 MOTION to Compel Non-Party Witness to Produce <i>Documents and Respond to Deposition Questions and to Complete Search of ESI</i> filed by John Stanley Pottinger.
04/27/2017	872	Unsealed by Second Circuit	OPINION: Because of the existence of triable issues of material fact rather than opinion and because the pre-litigation privilege is inapplicable, the motion for summary judgment is denied. For the reasons set forth above, the motion for summary judgment is denied. The parties are directed to jointly file a proposed redacted version of this Opinion consistent with the Protective Order or notify the Court that none are necessary within one week of the date of receipt of this Opinion. Motions terminated: denying 540 MOTION for Summary Judgment, filed by Ghislaine Maxwell. NOTICE of Errata filed by Jeffrey Epstein.
04/28/2017	873	Pleadings re. Third Parties - Other	NOTICE of Errata filed by Jeffrey Epstein.
04/26/2017	874	Pleadings re. Third Parties – Other	REDACTION <i>Declaration</i> by Jeffrey Epstein
04/28/2017	875	Case Management	NOTICE of Pursuant to Rule 415 Of Similar Acts Evidence filed by Virginia L. Giuffre.
04/28/2017	876	Pleadings re. Third Parties - Other	REPLY to Response to Motion re: 864 MOTION to Compel Non-Party Witness to Produce <i>Documents and Respond to Deposition Questions and to Complete Search of ESI</i> filed by Ghislaine Maxwell.

04/28/2017	877	Pleadings re. Third Parties - Other	DECLARATION of Laura A. Menninger in Support re: 864 MOTION to Compel Non- Party Witness to Produce <i>Documents and Respond to Deposition Questions and to Complete Search of ESI</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit F)
04/28/2017	878	Motion in Limine re. Admissibility of Evidence	MOTION to Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c) filed by Ghislaine Maxwell.
04/28/2017	879	Motion in Limine re. Admissibility of Evidence Ex. A-G	DECLARATION of Laura A. Menninger in Support re: 878 MOTION to Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c) filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G)
05/01/2017	882	Motion in Limine re. Admissibility of Evidence	FILING ERROR - WRONG EVENT TYPE SELECTED FROM MENU – MOTION in Limine to <i>Exclude Philip Barden</i> filed by Virginia L. Giuffre.
05/01/2017	883	Motion in Limine re. Admissibility of Evidence Ex. 1-3	FILING ERROR - DEFICIENT DOCKET ENTRY - DECLARATION of Sigrid McCawley in Support re: 882 MOTION in Limine to <i>Exclude Philip Barden</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed Composite 2, # 3 Exhibit Sealed 3)
05/02/2017	885	Motion in Limine re. Admissibility of Evidence	MOTION to Exclude Philip Barden from Testifying at Trial, to Exclude Defenses Based Upon Certain Documents and for Adverse Inference Jury Instruction filed by Virginia L. Giuffre..
05/02/2017	886	Motion in Limine re. Admissibility of Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 885 MOTION to Exclude Philip Barden from Testifying at Trial, to Exclude Defenses Based Upon Certain Documents and for Adverse Inference Jury Instruction filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2, # 3 Exhibit Sealed 3)
05/02/2017	886	Motion in Limine re. Admissibility of Evidence Ex. 1-3	DECLARATION of Sigrid McCawley in Support re: 885 MOTION to Exclude Philip Barden from Testifying at Trial, to Exclude Defenses Based Upon Certain Documents and for Adverse Inference Jury Instruction filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Composite Sealed 2, # 3 Exhibit Sealed 3)
05/02/2017	888	Pleadings re. Third Party-Other	REDACTION <i>Declaration of Jack Goldberger</i> by Jeffrey Epstein

05/03/2017	893	Motion in Limine re. Admissibility of Evidence	RESPONSE re: 875 Notice (Other) <i>in Opposition to Plaintiffs Notice Pursuant to Rule 415 of Similar Acts Evidence</i> filed by Ghislaine Maxwell
05/03/2017	894	Case Management Ex. 1	NOTICE of Intent to Request Redactions to March 30 & 31, 2017 Hearing Transcripts filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
05/03/2017	895	Motion in Limine re. Admissibility of Evidence Ex. A-G	DECLARATION of Laura A. Menninger in Support re: 893 Response filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A, # 2 Exhibit B, # 3 Exhibit C, # 4 Exhibit D, # 5 Exhibit E, # 6 Exhibit F, # 7 Exhibit G)
05/04/2017	896	Pleadings re. Third Parties – Other	MOTION to Compel <i>Non-Party Witness to Produce Documents and Respond to Deposition Questions and to Complete Search of ESI (Refiled)</i> . Document filed by Ghislaine Maxwell. (05/04/2017)
05/04/2017	897	Pleadings re. Third Parties – Other Ex. A-F	DECLARATION of Laura A. Menninger in Support re: 896 MOTION to Compel <i>Non- Party Witness to Produce Documents and Respond to Deposition Questions and to Complete Search of ESI (Refiled)</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit A-F) (05/04/2017)
05/05/2017	900	Motion to Compel	MOTION for Order to Show Cause <i>and to Enforce Court's March 22, 2017 Order</i> filed by Virginia L. Giuffre.
05/05/2017	901	Motion to Compel Improper Purpose Ex. 1	DECLARATION of Meredith Schultz in Support re: 900 MOTION for Order to Show Cause <i>and to Enforce Court's March 22, 2017 Order</i> filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1)
05/05/2017	906	Motion in Limine re. Admissibility of Evidence	RESPONSE in Opposition to Motion re: 878 MOTION to Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c) filed by Virginia L. Giuffre.
05/05/2017	907	Motion in Limine re. Admissibility of Evidence Ex. 1-11	DECLARATION of Sigrid McCawley in Opposition re: 878 MOTION to Exclude Undisclosed Witnesses and Exhibits Pursuant to Fed. R. Civ. P. 37(c) filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed 1, # 2 Exhibit Sealed 2, # 3 Exhibit Sealed 3, # 4 Exhibit Sealed 4, # 5 Exhibit Sealed 5, # 6 Exhibit Sealed 6, # 7 Exhibit Sealed 7, # 8 Exhibit Sealed 8, # 9 Exhibit Sealed 9, # 10 Exhibit Sealed 10, # 11 Exhibit Sealed 11)

05/05/2017	908	Pleadings re. Third Parties – Other	MOTION for Order Directing the FBI to Produce Photographs to the Court filed by Virginia L. Giuffre.
05/05/2017	909	Pleadings re. Third Parties – Other Ex. A-B	DECLARATION of Bradley Edwards in Support re: 908 MOTION for Order Directing the FBI to Produce Photographs to the Court filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit Sealed A, # 2 Exhibit Sealed B)
06/21/2017	922	Pleadings re. Third Parties – Intervenors	LETTER addressed to Judge Robert W. Sweet from Andrew G. Celli. Jr. dated June 21, 2017 re: Confidentiality Designations filed by Alan M. Dershowitz. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2, # 3 Exhibit 3, # 4 Exhibit 4, # 5 Exhibit 5, # 6 Exhibit 6)
10/19/2017	928	Pleadings re. Third Parties - Intervenors	RESPONSE in Opposition to Motion re: 924 LETTER MOTION to Seal Document <i>Submitted by Proposed Intervenors Jeffrey Epstein and Lesley Groff</i> addressed to Judge Robert W. Sweet from Michael C. Miller dated October 3, 2017 filed by Virginia L. Giuffre. SEALED DOCUMENT placed in vault.
11/28/2017	933	Pleadings re. Third Parties - Intervenors Ex. 1	NOTICE of Notice of Intent to Request Redaction of November 8 2017 Hearing Transcript filed by Virginia L. Giuffre. (Attachments: # 1 Exhibit 1 Redacted)
05/08/2018	947	Pleadings re. Third Parties - Intervenors Ex. A	LETTER addressed to Judge Robert W. Sweet from Andrew G. Celli, Jr. dated May 8, 2018 re: Pending application of Julie Brown and the Miami Herald Media Company to intervene and unseal filed by Alan M. Dershowitz. (Attachments: # 1 Exhibit A - June 2017 Letter (Redacted) SEALED DOCUMENT placed in vault.
12/04/2018	957	Motion to Compel	MOTION for Order to Show Cause <i>re Protective Order</i> filed by Ghislaine Maxwell.
12/18/2018	963	Motion to Compel Ex. 1	DECLARATION of Ty Gee in Support re: 957 MOTION for Order to Show Cause <i>re Protective Order</i> filed by Ghislaine Maxwell. (Attachments: # 1 Exhibit E)